

Representation Form

Please complete a separate **Part B Representation Form** (this part) for each representation that you would like to make. One **Part A Representation Form** must be enclosed with your **Part B Representation Form(s)**.

We have also published a separate **Guidance Note** to explain the terms used and to assist in making effective representations.

Part B: Representation

Name and Organisation:	Keith Fenwick Pegasus Group, on behalf of Barwood Land
------------------------	---

Q1. To which document does this representation relate?

- Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Sustainability Appraisal of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan
- Habitats Regulations Assessment of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan

(Please tick one box)

Q2. To which part of the document does this representation relate?

Paragraph:	Various	Policy:	Various	Site:	Land West of Ellesmere Rd	Policies Map:	Reg 19 submission
------------	---------	---------	---------	-------	---------------------------	---------------	-------------------

Q3. Do you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is:

- | | | | | |
|--|------|--------------------------|-----|--------------------------|
| A. Legally compliant | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| B. Sound | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |
| C. Compliant with the Duty to Co-operate | Yes: | <input type="checkbox"/> | No: | <input type="checkbox"/> |

(Please tick as appropriate).

Q4. Please give details of why you consider the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Please refer to attached Representations (ref: P18-2665 Ellesmere Road - Reg 19 Local Plan Representations). This document references the relevant parts of the Reg 19 Pre-submission Draft plan where comments have been made.

(Please continue on a separate sheet if necessary)

Q5. Please set out the modification(s) you consider necessary to make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at Q4 above.

Please note that non-compliance with the duty to co-operate is incapable of modification at examination. You will need to say why each modification will make the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please refer to attached Representations (ref: P18-2665 Ellesmere Road - Reg 19 Local Plan Representations). This document references the relevant parts of the Reg 19 Pre-submission Draft plan where comments have been made.

(Please continue on a separate sheet if necessary)

Please note: *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

Q6. If your representation is seeking a modification to the Regulation 19: Pre-Submission Draft of the Shropshire Local Plan, do you consider it necessary to participate in examination hearing session(s)?

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

- No, I do not wish to participate in hearing session(s)
 Yes, I wish to participate in hearing session(s)
(Please tick one box)

Q7. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Our representations relate to a strategic site that has draft allocation and therefore it is important that we attend hearing sessions.

(Please continue on a separate sheet if necessary)

Please note: *The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination*

Signature: [

Date: 23/02/2021

Office Use Only

Part A Reference:

Part B Reference:

'REGULATION 19: PRE-SUBMISSION DRAFT OF
THE SHROPSHIRE LOCAL PLAN 2016 TO 2038'
RESPONSE

SHROPSHIRE COUNCIL LOCAL PLAN
REVIEW

LAND WEST OF ELLESMERE ROAD, SHREWSBURY

ON BEHALF OF BARWOOD LAND

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

Prepared by: Pegasus Group

CONTENTS:

Page No:

1.	INTRODUCTION & PLANNING POLICY CONTEXT	1
2.	SETTLEMENT POLICIES & APPENDIX 7 (DELIVERY TIMESCALES)	3
3.	STRATEGIC POLICIES	9
4.	DEVELOPMENT MANAGEMENT POLICIES	14

APPENDIX 1: LOCATION PLAN

APPENDIX 2: ILLUSTRATIVE FRAMEWORK PLAN

APPENDIX 3: VISION DOCUMENT

APPENDIX 4: MINERAL RESOURCE ASSESSMENT

APPENDIX 5: HIGHWAYS TECHNICAL NOTE

1. INTRODUCTION & PLANNING POLICY CONTEXT

1.1 These representations relate to the approximately 23 hectare site at Land West of Ellesmere Road, Shrewsbury ('the Site') that is being promoted by Barwood Land. The Site is identified on the Location Plan at Appendix 1, along with the Illustrative Framework Plan, **which shows the Site's potential for a residential led development** in Appendix 2.

1.2 These representations are made by Pegasus Group, on behalf of Barwood Land, in response to the Shropshire Council Local Plan Review (2016-2038) 'Regulation 19 Pre-Submission Draft of the Shropshire Local Plan 2016 – 2038 (December 2020)'. The representations have had regard to the consultation document, accompanying published evidence, national and local planning policy context.

1.3 The tests of soundness that Development Plans need to meet so as to be legally compliant and found sound, are set out in the National Planning Policy Framework (NPPF), paragraph 35:

- Positively prepared – providing a strategy which, as a minimum, seeks to meet objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective – deliverable over the Plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Framework.

1.4 These tests of soundness, along with other legal and procedural requirements associated with the Plan-making process provide a contextual framework for these representations.

1.5 Fundamentally, these representations have been made strongly supporting the allocation of Land West of Ellesmere Road, Shrewsbury (ref: SHR173), with

Barwood Land's substantive concern relating to the policy restriction that seeks the delay of delivering this allocated site until the North West Relief Road is operational. This is unnecessary, not wholly justified and there are a number of policies within this Local Plan Review that the Site's development will support, along with the appropriate level of housing delivery.

- 1.6 Barwood Land supports the approach taken by Shropshire Council in continuing with a review of the Shropshire Local Plan to 2038. This provides the opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals.
- 1.7 It is recognised that the previous Regulation 18 Pre-Submission Draft consultation was primarily in response to the Council having introduced a Green Belt release proposal at Tasley, Bridgnorth as a strategic allocation at a later stage in the plan making process and representations were invited so as not to prejudice any interested parties. The Regulation 18 Pre-Submission Draft was consulted upon during August-September 2020 and representations were made upon it by Pegasus Group, on behalf of Barwood Land. Following this, the Local Plan review has now moved to the Regulation 19 Pre-Submission Draft and consultation will end on 26th February 2021.
- 1.8 Barwood Land has continuously promoted the site, at Land west of Ellesmere Road, Shrewsbury (SHR173) at all stages of the plan making process to date i.e. Issues and Strategic Options, Preferred Sites and Regulation 18 Pre-Submission Draft consultations. As part of this process, Barwood Land has engaged with the Local Planning Authority to promote the Site's suitability, availability and achievability, for delivering a sustainable residential development. The meetings and discussions held have resulted in the production of a Vision Document which is also formally submitted again at this stage to support the proposed Site Allocation. This Vision document (July 2019) promoted the same land called simply Land at Ellesmere Road, Shrewsbury. This is attached at Appendix 3. The Vision Document has been underpinned by technical analysis and assessment to enable a deliverable development proposal to be promoted here.

2. SETTLEMENT POLICIES & APPENDIX 7 (DELIVERY TIMESCALES)

S16. Shrewsbury Place Plan Area

Schedule S16.1(i). Residential and Mixed Use Allocations: Shrewsbury Strategic Centre (p270)

Site Allocation: Land West of Ellesmere Road, Shrewsbury (SHR173) for 450 dwellings

(p's 274 – 275)

'To ensure suitable access arrangements are achieved as well as protecting local amenity value on Ellesmere Road, the delivery of this development is directly dependent on the approval and construction of the North West Relief Road. Development on the site will not commence until such time as the North West Relief Road is operational.

A comprehensive sustainable residential development will be delivered. The development of this site will be in accordance with a Masterplan which will need to reflect the objectives of the Big Town Plan and any related masterplans, be prepared in consultation with the public and adopted by Shropshire Council as a significant material planning consideration.

*A decision on a planning application will not be made until such time a Masterplan for the site has been approved by Shropshire Council, which addresses the following areas as a minimum: The quality, design, mix and layout of housing should be **informed by site constraints site opportunities, including the site's proximity to the Old River Bed**, identified local needs and relevant policies of this Local Plan;*

A local centre is provided on at least 0.25 ha of the site, to be located appropriately to encourage opportunity for pedestrian and cycle access from existing residential areas on Ellesmere Road;

A sustainable movement strategy is delivered, incorporating appropriate access from Ellesmere Road as well as the delivery of a suitable internal road network. All necessary improvements to the Local and Strategic Road Networks will be undertaken and funded through the development, informed by consultation with Highways England and an appropriate Transport Assessment (including consideration of cumulative impact);

Development will create and enhance pedestrian and cycle links within and through the site, utilizing the site's proximity to the town centre;

*Green infrastructure corridors will be expected to form an intrinsic component of this development, contributing to the objectives of the Big Town Plan to improve **the town's green network, and which provides** enhancements to the Old Riverbed Local Wildlife Site and environmental networks in and around the site;*

*Either on or off site contributions are made towards the delivery of additional **playing pitch provision in line with the Council's Playing Pitch and Outdoor Strategy.***

Mature trees, hedgerows and priority habitats will be retained, forming part of the green infrastructure network. Where appropriate it will also be enhanced and expanded to create a sustainable juxtaposition between the built and natural form;

***Site design and layout will reflect and respect the site's heritage and heritage assets** within the wider area;*

Local amenity will be protected through acoustic design, layout, green infrastructure and appropriate building materials will be used to appropriately manage noise, particularly associated with Ellesmere Road.

Sustainable drainage and flood risk mitigation measures will be incorporated into the site. Any residual surface water flood risk will be managed by excluding development from the affected areas of the site, which will form part of the Green Infrastructure network. Flood and water management measures must not displace water elsewhere.

Development will also be excluded from the elements of the site located in Flood Zones 2 and/or 3, which will form part of the Green Infrastructure network.'

- 2.1 Barwood Land welcomes and supports the inclusion of this Site under reference SHR173 in this emerging Local Plan. As stated in the Introduction Section of this report, Barwood Land has promoted their land interests here since Plan preparations started and have had thorough engagement with the Local Planning Authority to date to support the plan-led approach. Those meetings resulted in the production of a Vision Document (July 2019) that was supported by technical work including minerals assessment, highways, landscape, heritage and ecology. This site analysis and design within the Vision Document demonstrates that the Site is suitable, available and achievable for sustainable residential development.

2.2 The proposed allocation in the Draft Policy SHR173 is for 450 dwellings, however, as demonstrated in the Illustrative Framework Plan at Appendix 2, the Site has the capacity to accommodate up to 500 dwellings over the developable area of 14.35ha. This could be delivered at:

Phase 1: 5.72ha (200 dwellings at 35dph)

Phase 2: 8.63ha (300 dwellings at 35dph)

2.3 Notwithstanding the draft Plan requirement to allow for a local centre on at least 0.25 ha of the site which is not yet reflected in the Vision Document, the Site could still accommodate up to 500 dwellings without needing to alter the wider development parameters. Policy SHR173 should therefore amend the provision from 450 to 500 dwellings, a quantum which can be delivered whilst providing the requisite infrastructure such as play areas, strategic green space and wildlife ponds. There is no reason why the Site should be artificially restricted at 450 dwellings, especially once the NWRR is provided, and this extra provision would contribute to the delivery of the recognised housing needed over the plan period. This would also be in accordance with the NPPF (2019) in achieving appropriate densities as at paragraph 122 ' Planning policies and decisions should support development that makes efficient use of land,'.

2.4 The broad principles of the Development Guidelines are supported, including the provision of a local centre. We would welcome the flexibility within the policy wording to enable this to more easily be provided as a single retail outlet in place of a 'local centre', to maximise attractiveness and suitability to potential retail operators.

2.5 It is noted that the draft allocation seeks Development on the site to not commence until such time as the North West Relief Road is operational.

2.6 The restriction of only allowing commencement of development once the North West Relief Road (NWRR) is operational is also included in the explanatory text of the policy at paragraph 5.225. The NWRR was granted government funding in March 2019 and in December 2019 Shropshire Council's Cabinet approved a proposal to combine the NWRR and the Oxon Link Road into one project, as the two projects are intrinsically linked.

2.7 An Environmental Impact Assessment Scoping Opinion (ref: 19/05023/SCO) for the NWRR was validated in November 2019 and a screening decision issued in

January 2020. Public consultation was held during 2 March-30 April 2020, and a planning application has recently been submitted (19 February 2021). The application is supported by a construction timetable which shows an indicative full operational date of Spring 2024.

2.8 The Highways Technical Note at Appendix 5 has conducted trip generation analysis against several scenarios between 50-250 dwellings, and the trip distribution analysis at the five junctions identified as part of previous discussions with the Highways department being:

- Battlefield Roundabout;
- Ellesmere Road / Harlescott Lane ghost right turn priority;
- Ellesmere Road / Hubert Way ghost right turn priority;
- Ellesmere Road / Berwick Road signals; and
- Shrewsbury Station Gyratory.

2.9 The Note demonstrates that up to 100 dwellings can immediately come forward prior to the NWRR being operational, without having a significant adverse impact on the current highway network. The Note references that the figure could be greater than this, but any additional delivery would need to be supported by post-covid survey effort and detailed capacity assessments. As a minimum, therefore, the Policy SHR173 site allocation should be amended to allow for up to 100 dwellings to be delivered without restriction, but given the overall commentary on the NWRR timetable and site delivery below, the evidence for the need for any Plan based restriction on delivery, is unclear.

2.10 In terms of site delivery, a reasonable scenario could see a planning application made in Autumn 2021, and subject to there being no material objection to the draft allocation, outline permission being granted in Spring 2022. Reserved Matters to then be secured by the end of 2022, with construction starting in Spring / Summer 2023. In this scenario, with the NWRR scheduled to be fully operational by Spring 2024, in practice the restriction proposed by the allocation will serve no useful purpose. It would likely be 2 years for the site to deliver beyond the minimum 100 dwelling threshold currently identified as the capacity limitation on the Ellesmere Road, by which time the NWRR will be fully operational. Therefore, there should be no reason to cap it.

- 2.11 If a conditional aspect linked to delivery of the NWRR is deemed to be necessary, it is suggested that the policy be changed to the below, with the explanatory text amended to reflect this:

"To ensure suitable access arrangements are achieved as well as protecting local amenity value on Ellesmere Road, up to 100 dwellings can be constructed and occupied prior to the delivery of the North West Relief Road, with additional delivery beyond this subject to the outcome of detailed capacity assessments of the local road network. The occupation of the remaining dwellings should follow the operational opening of the North West Relief Road."

- 2.12 It is important that the trigger related to this policy and the NWRR becoming operational, is tied to occupation of dwellings, and not commencement of development.
- 2.13 The Development Guidelines at page 274 of the Plan, request the preparation of a Masterplan in consultation with the public and adopted by Shropshire Council, with a decision not to be made on a planning application until such a time a Masterplan for the Site has been approved by the Council. The adoption and approval of a masterplan prior to an application being submitted is not necessary for the effective delivery of a sustainable residential development. Instead, the policy should be amended to read that a comprehensive masterplan should be submitted as part of a planning application that has been demonstrably informed by public consultation and engagement. This way, delays in bringing an application forward would be avoided and it would not materially change or influence the Council's decision-making process. Such an approach would be entirely consistent with the Government's drive for delivery, and to ensure that the supply of homes is significantly boosted (NPPF 59).
- 2.14 The Guidelines also require that either on or off-site contributions are made to the delivery of additional playing pitch provision in line with the Council's Playing Pitch and Outdoor Strategy. However, the published evidence base appears to contain only a Shropshire Council Action Plan (October 2020) and Shropshire Council Playing Pitch & Outdoor Sports Strategy Executive Summary (October 2020). It should be made clearer which document should be observed and if no relevant document has been published, reference to playing pitch provision should be removed. Nonetheless, if a relevant document does exist then the policy should be amended to read:

"Where identified as part of the Council's Playing Pitch and Outdoor Strategy, and where necessary, either on or off site contributions are made towards the delivery of additional playing pitch provision."

2.15 To conclude, Barwood Land can confirm that the Site is viable, available and achievable, and is expected to deliver housing in accordance with the policy requirements identified within the 'Regulation 18: Pre-Submission Draft Shropshire Local Plan'. Any restriction on the delivery of the housing on Site linked to the opening of the NWRR is considered unnecessary given the timings for delivery of both being compatible, if any restriction is deemed necessary, it should not apply to a minimum of 100 dwellings, which the evidence demonstrates can be accommodated on the Ellesmere Road without creating any significant impact.

APPENDIX 7: Forecast of delivery timescales for local plan allocations

2.16 Barwood Land can confirm that the timescales for the delivery of the proposed site allocation Land West of Ellesmere Road, Shrewsbury (SHR173) is too protracted:

Site Allocation Reference	Site Allocation Name	Settlement	Place Plan	Residential Guideline	Employment Guideline	Short-Term (2020/21-2024/25)	Medium-Term (2025/26-2029/30)	Long Term (2030/31-2034/35)	Long Term (2035/36-2037/38)	Beyond the Plan Period (2038+)
SHR173	Land west of Ellesmere Road, Shrewsbury	Shrewsbury	Shrewsbury	450	N/A					

2.17 The delivery of the Site is anticipated to be between the Short-Term and Medium-Term in the Local Plan, even with the residential guideline increasing to 500 dwellings. In the short-term (ie pre 2025) 200 dwellings are deliverable, with 300 dwellings in the medium-term. This needs to be recognised so as not to artificially constrain the appropriate delivery of housing.

3. STRATEGIC POLICIES

SP2. Strategic Approach

- 3.1 The Plan's strategic approach sets out that during the plan period to 2038 Shropshire Council will deliver a minimum of 30,800 dwellings, equating to around 1,400 dwellings per annum. Shrewsbury is planned to continue to fulfil its role as the Strategic Centre and County Town for the area and to act as a focus for new housing in a sustainable location, as *the* principal settlement at the top of the settlement hierarchy as identified in Schedule SP2.1: Urban Locations. The Site will assist in contributing to this housing target over the Plan period, and reinforce the Local Plan strategy for additional growth to be located at the highest level of the settlement hierarchy, which is supported, and in accordance with the Shropshire Council Hierarchy of Settlements (2017) <https://shropshire.gov.uk/committee-services/documents/s16708/Appendix%20Local%20Plan%20report%20-%20Hierarchy%20of%20Settlements%20Assessment.pdf>

SP3. Climate Change

- 3.2 This policy seeks to support the transition to a zero-carbon economy in Shropshire, through the reduction of carbon emissions through a number of means. The minimisation of travel and encouragement of public transport, delivering higher density development and encouraging new development to link and where possible integrate with public transport is supported; as detailed in Parts 1a, 1b, and 1e respectively.
- 3.3 Parts 1g and 2a of the policy make reference to promoting fabric energy efficiency, and integrating renewable and low carbon energy systems in line with Policy DP11 of this Pre-Submission Draft. These requirements should not undermine the deliverability of the Plan, as stated at paragraph 34 of the NPPF. Parts 1g and 2a should instead defer to the latest building regulations, as changes have already been made to those, to achieve energy efficiency standards. Planning Policy should not duplicate legal requirements covered elsewhere. Building regulations already consider the energy efficiency of buildings and this policy, as worded, adds no material value. Any requirement that goes beyond building regulations should be on a needs only basis, informed by detailed evidence. This policy should therefore be amended to read:

"1. Reducing carbon emissions through a number of means, including:

g. Promoting fabric energy efficiency, including as part of the retrofitting of existing buildings, in line with the relevant Building Regulations."

"2. Integrating or supporting both on-and off-site delivery of renewable and low carbon energy, including by:

a. Integrating renewable and low carbon energy system into all residential developments of one or more dwellings in line with the relevant Building Regulations."

- 3.4 The encouragement of development to offset its carbon emissions through investment in carbon capture and storage (informed by the Shropshire Climate Change Strategy) should be clarified as being an optional requirement.
- 3.5 This policy should be amended to reflect the above in order to be found sound, be fully justified and compliant with national policy.

SP5. High-Quality Design

- 3.6 Part 5 of the policy states that developments of poor design will be refused, including those [proposals] where inadequate information has been provided. This part of the policy is written in the negative form and should be more balanced, i.e. where development positively demonstrates design principles being incorporated then planning permission will be granted.
- 3.7 The explanatory text of this policy requires all planning applications for new development to set out how they comply with this policy and the principles of the West Midlands Design Charter. However, the West Midlands Design Charter is not intended to set local design policy, and has not been subject to the same process of preparation, consultation and examination as the Local Plan Review.
- 3.8 It is noted that there is an absence of reference to the National Design Guide (October 2019) which has significantly more material planning weight than a regional design guide. Also, this follows into the consultation currently being conducted (until 27 March 2021) on the draft National Model Design Code. This expands upon the ten characteristics of good design, reflecting the Government's priorities and intention to provide a common overarching framework for design. It is expected that this will be used to inform local design guides, codes and policies,

and therefore it would be useful to reference; along with the DfT Cycle Infrastructure Design Guide (July 2020).

- 3.9 This policy should be amended in order to be found sound, as it needs to be fully justified against national design guidance with references made to it, and more balanced in its overall approach to appreciate where good design principles have been adhered to.

SP6. Health and Wellbeing

- 3.10 This policy lists a variety of requirements that new developments should achieve to ensure the health and well-being of individuals, communities and places; and that major applications be accompanied by a proportionate Health Impact Assessment (HIA). However, HIAs require a screening and scoping process, and not all developments will require one. An HIA can be in the form of an Intermediate HIA or Rapid HIA. Therefore, the policy should make clear that major developments would be required to screen/scope the need for a HIA and that these can either be intermediate or rapid submissions.
- 3.11 This policy should be amended in order to be found sound, as it needs to be fully justified against the HIAs screening and scoping process, and that major developments would be required to enter this process either through an intermediate or rapid submission.

SP12. Shropshire Economic Growth Strategy

- 3.12 This policy places the focus for economic growth and investment towards Shrewsbury, to develop its role as the County Town and Strategic Centre. The delivery of employment will be supported by investment in housing to make Shropshire a good place to live, work and play.
- 3.13 This policy is supported as it recognises the role of Shrewsbury, within the settlement hierarchy, (as set out in the Shropshire Council Hierarchy of Settlements (2017)<https://shropshire.gov.uk/committee-services/documents/s16708/Appendix%20Local%20Plan%20report%20-%20Hierarchy%20of%20Settlements%20Assessment.pdf>) and the need to balance employment growth alongside new housing developments to support an expanded workforce. The two go hand-in-hand, and sustainable growth is achieved when the desire and aspiration of a new workforce are satisfied by a complementary housing market.

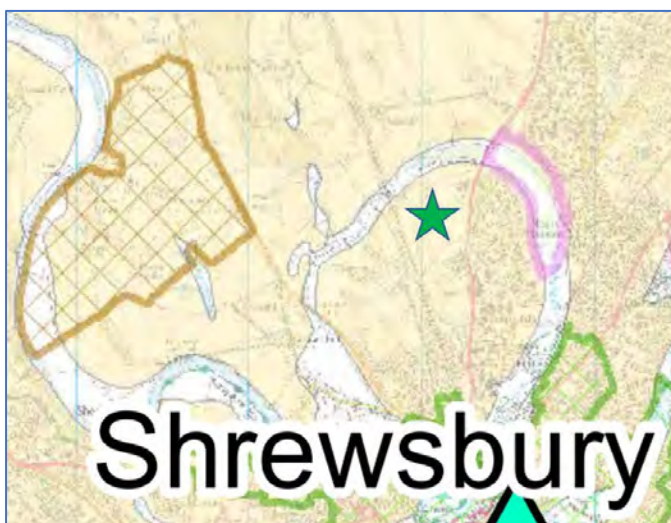
SP16. Strategic Planning for Minerals

- 3.14 The draft policy states that Shropshire's important and finite mineral resources will be safeguarded to avoid unnecessary sterilisation, with protection afforded to Mineral Safeguarding Areas (MSA). Part 1 of the policy references the broad extent of the MSA as shown in Figure SP16.1 (although incorrectly referenced as Figure SP15.1) and the Site has been included for Sand & Gravel (as reflected in Figure 1 below and indicated by a star) and also included as part of the Regulation 19: Pre-Submission Draft Policies Map (as shown in Figure 2 below and indicated by a star):

Figure 1: Figure SP16.1 Mineral Safeguarding Areas (MSAs) in Shropshire



Figure 2: Regulation 19: Pre-Submission Draft Policies Map



- 3.15 Policy MD16 (3) requires non-mineral applications within a MSA to be accompanied by a Mineral Assessment. A Mineral Resource Assessment report has been prepared and is attached at Appendix 4, which demonstrates that minerals cannot be extracted from this Site in an economically viable way, and is constrained further by existing residential properties, the railway line and a gas pipeline.
- 3.16 The report also demonstrates there is an abundance of high-quality Sand & Gravel deposits within the County and that the seven-year landbank required by the NPPF has been exceeded. Additionally, prior extraction of the mineral was also shown to be unfeasible, and so the background evidence base demonstrates that on this particular site, safeguarding the land for mineral extraction would be inappropriate to take forward within this emerging Shropshire Local Plan.
- 3.17 We respectfully request that the Site, which is allocated as a strategic allocation Ref: SHR173, be excluded from the need to be safeguarded further with an MSA, as the Mineral Resource Assessment prepared demonstrates extraction of minerals on the Site would be unpractical and unviable; and is in compliance with the Minerals Plan and its release for development would not conflict with it.

4. DEVELOPMENT MANAGEMENT POLICIES

DP1. Residential Mix

4.1 Part 6 of this policy needs to start with:

"On sites of 50 or more dwellings:

a) where need is demonstrated, an appropriate range of specialist housing designed to meet the diverse needs of older people, such as: age-restricted general market housing; retirement living or sheltered housing; extra care housing or housing-with-care; and/or residential care homes and nursing homes will be provided.

b) where need is demonstrated, an appropriate range of specialist dwellings to meet the needs of those with disabilities and special needs will be provided."

4.2 In order for this policy to be reasonably applied and found sound, it needs to be justified through the preparation of needs assessments to evidence the specialist and specific types of properties sought for. Without this, the viability evidence required to underpin the policy is not robust and potentially places an unreasonable financial burden upon developments as build costs are higher due to specific design criteria to serve older people. This policy should, therefore, be amended to include 'where need is demonstrated' to be found sound, be justified and compliant with national policy.

DP2. Self-Build and Custom-Build Housing

4.3 This policy has a prescribed level of 10% serviced plots for self-build purposes on sites delivering 10 or more dwellings, where there is an identified need on the Self-Build Register.

4.4 This sentiment is supported but it is suggested that the spatial strategy that underpins this amended. Reference is made to the HBF comments on self-build, where it is acknowledged that customers seeking self-build opportunities also seek smaller, more rural sites rather than serviced plots within a larger strategic allocation. It is suggested that rural housing sites are encouraged to be proposed as self-build sites, which may be more attractive and thus more deliverable / achievable, resulting in a successful policy.

4.5 Paragraph 61 of the NPPF recognises that the housing needed for different groups in the community should be assessed and reflected in planning policies, including

for those wishing to commission or build their own homes. Footnote 26 further expands:

"Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. Self and custom-build properties could provide market or affordable housing."

- 4.6 The NPPF does not provide a specific percentage of self-build plots to be provided and that the Self-Build Register should inform demand, with enough suitable development permissions allowed to meet the identified demand.
- 4.7 This policy should be amended to solely reference the Self-Build Register in order to be found sound. There is no justification for the prescribed level of 10% serviced plots and as it currently reads is not compliant with national policy.

DP3. Affordable Housing Provision

- 4.8 The requirement for 10 or more dwellings or sites of 0.5ha or more to provide 10% affordable housing in the north of the District is supported. It is also supported that reduced rates of affordable housing will be considered in exceptional circumstances, where evidence is presented demonstrating viability concerns.
- 4.9 Part j. states that affordable housing will be allocated in accordance with Shropshire Council's Allocation Policy and we assume that this is in reference to the Shropshire Affordable Housing Allocation Policy and Scheme (March 2014). However, the purpose of this document is to determine the degree of housing need and priority for Registered Providers and Landlords, for the benefit of applicants on the Housing Register. Reference to the Shropshire Council's Allocation Policy should be removed as it is not relevant to planning as the primacy of this policy is to secure affordable housing, rather than advise how it should be allocated, and to whom, thereafter.

DP.11 Minimising Carbon Emissions

- 4.10 As stated under the comments made for Policy SP3 above, requirements for fabric energy efficiency, minimum energy performance requirements and low carbon energy systems should not undermine the deliverability of the Plan, as stated at paragraph 34 of the NPPF. This policy seeks to achieve a minimum of 19%

improvement in the energy performance requirement in Part L of the 2013 Building Regulations, and that 10% of predicted energy needs is from on-site renewable and low carbon energy sources. It also strongly encourages that new dwellings, particularly those for 50 or more dwellings, achieve zero net-carbon emissions, utilise district heating and cooling systems and connect to wider heating and cooling networks both for energy supply and export.

- 4.11 There is no justification for why 10% of energy needs is required to come from on-site renewable and low carbon energy sources. As long as power comes from renewable and low carbon sources, it should not matter whether this is sourced on or off-site. Paragraph 151 of the NPPF promotes the use and supply of renewable and low carbon energy and heat, but does not specify that these must be met on-site. Therefore, this policy is not justifiable as the delivery mechanism should be flexible to enable developers to provide their own solutions rather than providing onerous requirements that are too prescriptive and may stifle development from being delivered.
- 4.12 District wide heating/cooling systems, may be unsuitable as they may be unreliable, expensive and may also attract high management and repair costs. Also, the current predominant technology for district wide heating is gas combined heat and power (CHP) plants, with over 90% of district networks being gas fired. Furthermore, some heat network consumers do not have comparable levels of satisfaction as those on standard gas and electricity networks, and pay a higher price. Given that there are other options such as solar and alternative off-site generations of carbon neutral energy, which may be more reliable maintenance free options, there is no justification for an emphasis on on-site district heating.
- 4.13 The policy should be flexible, not prescriptive, so that it can keep pace with technology which is dynamic, whilst the local plan process is not.
- 4.14 The broad principles of this policy should be further refined as changes have already been made to building regulations to achieve energy efficiency standards. Building regulations already considers the energy efficiency of buildings and this policy, as worded, adds no material value and will potentially stymie development that accords with government/building regulation standards. Any requirement that goes beyond building regulations should be informed by detailed evidence, as to viability, when evidenced with the objectives of the Plan when read as a whole.

- 4.15 This policy should be amended to reflect the flexible nature of low carbon energy sources and should not direct developments to a specific type, whether on or off-site, which may in fact be less 'green' than alternatives available. The policy should not go beyond building regulation standards in order to be found sound, otherwise it should be fully justified through detailed evidence, in order to be compliant with national policy.

DP12. The Natural Environment

- 4.16 Policy DP12 at part 1 identifies a requirement that development which has a significant effect on an internationally designated sites should be subject to a project level Habitats Regulations Assessment (HRA). With regard to any site subject to a Local Plan allocation, however, this requirement for a HRA should be identified as part of the development guidelines of an allocation, to provide further clarity.
- 4.17 Part 3 of the policy requests a minimum of 10% net gain for biodiversity and references the Environment Act. However, the Environment Act of 1995 does not require net gain for biodiversity, and the explanatory text of the policy further states:

*"The government announced in 2019 that it would mandate biodiversity net gain to ensure new **development enhances the environment...The Bill will make it mandatory for housing and development to achieve at least a 10% net gain in value for biodiversity...Developers must submit a 'biodiversity gain plan' alongside usual planning application documents.**"*

- 4.18 It appears that the requirement for biodiversity net gain is based upon a Bill (not the Environment Act 1995) that is yet to achieve royal assent. As this Bill is not yet an Act of law, it cannot yet be depended upon as a reference for this policy because it may change as it goes through all parliamentary stages, and even then there is no guarantee it will become an Act of law.
- 4.19 Paragraph 174 b) of the NPPF promotes the identification and pursuit of opportunities for securing measurable net gains for biodiversity, as part of the local plan process. However, any requirement should not undermine the deliverability of the Plan, as stated at paragraph 34 of the NPPF; therefore, any request for biodiversity gain must be made through a proportionate and detailed evidence base.

- 4.20 We suggest that Policy DP12 is amended to reflect a strategy that accords with the emerging direction of national policy but does not exceed it.

DP14. Green Infrastructure

- 4.21 For significant new development, including strategic sites, green infrastructure should be an integral part of a masterplan that links existing and new green infrastructure, and connects to the green infrastructure network in the surrounding area and improves that network's accessibility and linkages where possible.
- 4.22 Whilst Barwood Land supports the aim of maximising green infrastructure and expanding the current network, it should be recognised that existing local strategies, such as the Shrewsbury Big Town Plan that has a vision for Green Networks across Shrewsbury, must accord with the Development Plan which takes precedent as policy. Where there is conflict, the Development Plan will provide the prevailing policy.

DP15. Open Space and Recreation

- 4.23 The delivery of quality open space is considered an essential part of new development and is supported in principle. There is an expectation in this policy for on-site open space for new housing development at a provision equivalent to 30sqm per person, assuming one person per bedroom. However, this level can be reduced where a development is to provide a particularly high-quality area of on-site open space which meets the needs of all residents. In consideration that the policy expects 'good' quality open space, but the provision can be reduced if 'high' quality open space is delivered, clarity is required in the policy as to what defines good and high quality open space, and what developments are expected to deliver.
- 4.24 We would like to draw your attention to the Draft Green Infrastructure Strategy for the Epping Forest district (Consultation version June – July 2020) <https://www.eppingforestdc.gov.uk/wp-content/uploads/2020/06/Draft%20green%20infrastructure%20strategy.pdf>
- 4.25 Epping Forest DC note that in paragraphs 1.15 and 1.16 of this document:

"Key to the success of GI is its provision as a multifunctional 'asset'. However, open space assessments and policy requirements are often based on individual typologies. Too often new developments follow the provision of GI through a rigid application of individual typology standards, and as such wider benefits that could

be delivered by taking a strategic approach to GI provision to designing multifunctional space are missed. Taking a narrow approach can result in the creation of bland and unattractive places which do nothing to encourage people to use them. Therefore the quality of GI is as important as the quantity of GI, whilst recognising that the quantity of provision forms the backbone of many typologies. There will, however, be occasions, particularly where there are deficiencies in the quality rather than the quantity of a typology, that greater benefits can be achieved by investing in existing spaces rather than in creating additional space.

In the context of national and local planning policy and guidance in relation to place-making and good design, an approach that simply follows space standards is not enough".

- 4.26 It is suggested that a flexible approach is taken by Shropshire Council in the approach to open space, similar to the Epping Forest example above, where well-developed schemes can positively help in meeting the requirements for open space and rigid adherence to formulaic standards have the potential to stifle good design.

DP16. Landscaping of New Development

- 4.27 Part 2 of the policy states that existing landscapes of ecological value or those with heritage significance should be conserved and enhanced, with schemes being designed to be sympathetic to their importance to avoid harm. Instead of avoiding harm this should be amended to require harm to be minimised. With reference to heritage and conservation, the degree of harm and the importance attached to it should be consistent with Chapter 16 of the NPPF, which requires the harm to the significance of any heritage asset to be taken into account.
- 4.28 Part 6 of this policy states, "*Trees within adoptable areas should be incorporated as part of the infrastructure planning and design stage in accordance with current best practice*". Any tree planting on adoptable areas will require County Highways agreement, and therefore should be amended to read, "*Trees within adoptable areas should be, where practical and in agreement with County Highways, incorporated as part of the infrastructure planning and design stage in accordance with current best practice*".
- 4.29 This policy should be amended to reflect the above, in order to be found sound, be fully justified, effective and compliant with national policy.

DP20. Water Efficiency

- 4.30 This policy expects new housing development to meet the optional Building Regulations standard of restricting water use to 110 litres per person per day and that major developments will be expected to provide a programme of water efficiency promotion and consumer education.
- 4.31 If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then this should be justified against the criteria in National Planning Policy Guidance (ID 56-013-20150327 to 56-017-20150327). Also, under current Building Regulations, all new dwellings achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock.
- 4.32 The expectation for a programme of water efficiency promotion and consumer education is not required if minimisation of water use through the development construction is being implemented. This part of the policy requires further justification and clarity as to what this entails and how long it is expected for.
- 4.33 This policy should be amended to provide further justification and clarity in order to be found sound, needs to be positively prepared so it can be fully justified and effective.

DP21. Flood Risk

- 4.34 Part 2 a. of the policy states:

"2. The Sequential Test is not needed for:

a. Development on land allocated in this plan unless the use of the site, or is not in accordance with the use specified in this Plan."

- 4.35 The policy is supported as it does not require sequential tests to be provided for allocated sites, unless the use proposed is not in accordance with the Plan, with further detail provided within Development Guidelines for allocated sites. However, the wording of the policy should be tweaked to read:

"2. The Sequential Test is not needed for:

a. Development on land allocated in this plan, unless the use of the site is not in accordance with the use specified in this Plan and falls within Flood Zones 2 and/or 3."

DP22. Sustainable Drainage Systems

- 4.36 Part 5 of this policy requires an additional, but unspecified, allowance to reduce the impact of urban creep and notes that guidance for this is provided by the Lead Local Flood Authority (LLFA). However, it is not clarified what the guidance is and places an onus upon the LLFA to engage with developers at the pre-submission stage. Clarity should be provided by more specific reference to the guidance within the policy.
- 4.37 This policy should be amended to provide an evidence base and reference specific guidance in order for it to be fully justified, viable and found sound.

DP23. Conserving and Enhancing the Historic Environment

- 4.38 Heritage policy is clearly set out on the NPPF, with an emphasis on avoiding harm to the significance of designated heritage assets, with more flexibility provided to non-designated heritage assets. There is a significant risk that the local plan is seeking to reframe the language of national policy, through parts 1-4. Whilst there is a need for a historic environment policy as part of the local plan, this need only comprise parts 2 and 3 of the draft policy.
- 4.39 Part 7 of the policy states that applications for development affecting designated or non-designated heritage assets are to be determined in line with more detailed supplementary planning guidance where applicable. From the wording, it is clear that this guidance has not yet been published and it is assumed that it will be produced alongside the local plan review. However, applications can only be determined in accordance with the development plan, unless material considerations indicate otherwise, i.e. the NPPF/supplementary guidance. Decisions made on applications can only be made in accordance with relevant policies of the development plan that have gone through the scrutiny of public examination, with supplementary planning guidance being a material consideration.
- 4.40 This part of the policy is vague and imprecise, and it is not clear how the supplementary guidance will differ from the NPPF. There would be no justification

for supplementary guidance to depart from NPPF policy, which has been scrutinised and clarified by courts in a number of high-profile cases, and should therefore be removed.

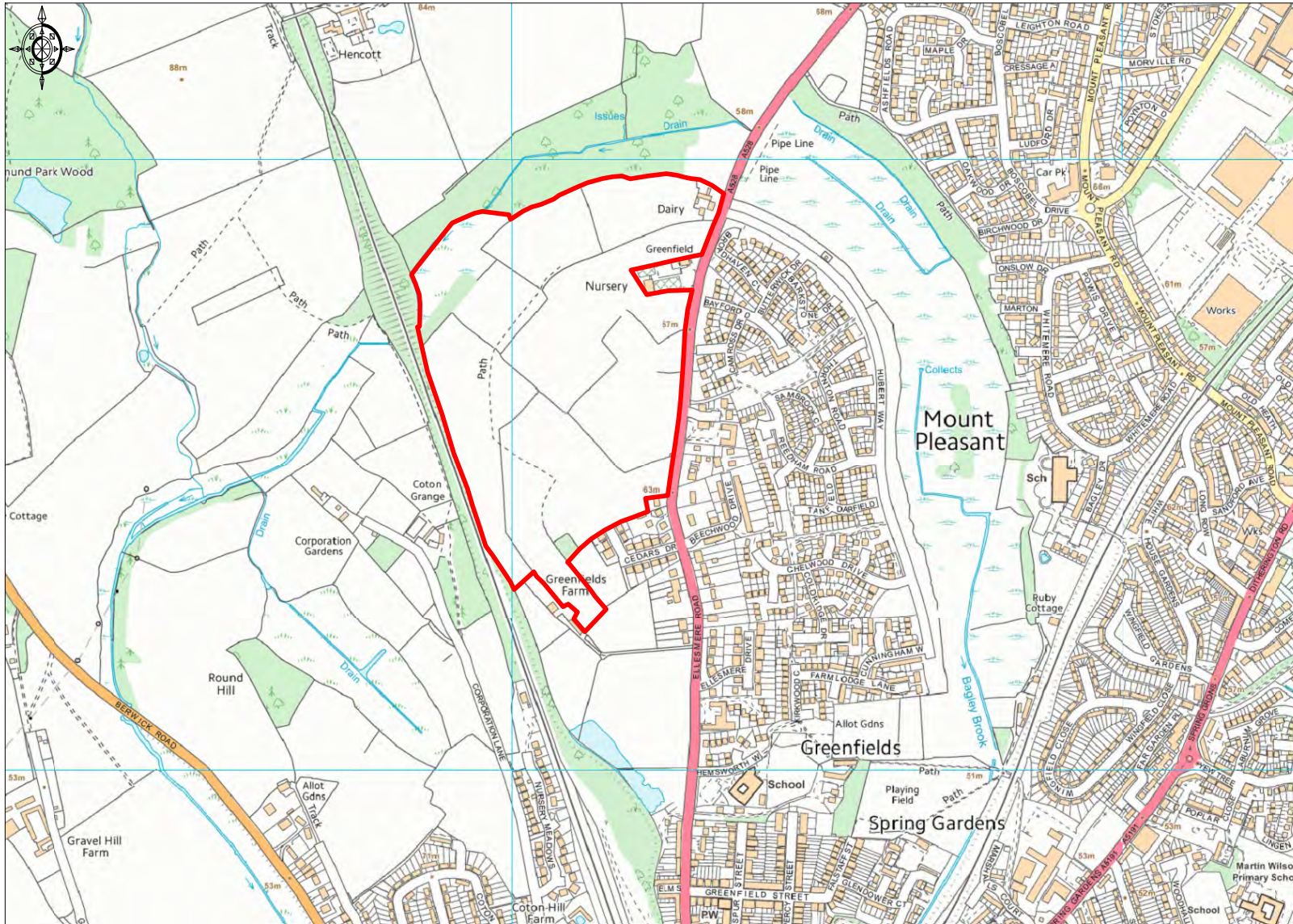
- 4.41 This policy should be amended to reflect the above in order to be found sound, be justified, effective and compliant with national policy.

DP.27 Broadband and Mobile Communications Infrastructure

- 4.42 Part 3 of the policy requires residential developments to deliver gigabit-capable broadband infrastructure using 'fibre to the premises' technology wherever practical.
- 4.43 The capacity to deliver gigabit-capable broadband is determinate upon broadband providers and cannot be guaranteed by developers. Approved Document R: Physical Infrastructure for High-Speed Electronic Communications Networks is a consideration for Building Regulations and requires in-building infrastructure for copper or fibre-optic cables or wireless devices capable of delivering broadband speeds greater than 30 Mbps to be installed. Broadband infrastructure is already covered by Building Regulations and the requirement of this policy that is well above 30 Mbps, is not justified.
- 4.44 This policy should be amended to require broadband installation without being more specific about the type of broadband required to be provided.

APPENDIX 1: Location Plan

Land West of Ellesmere Road, Shrewsbury



Ordnance Survey © Crown Copyright 2017. All rights reserved. Licence number 100022432. Plotted Scale - 1:10000

APPENDIX 2: Illustrative Framework Plan



Illustrative Framework Plan

APPENDIX 3: Vision Document



Land at Ellesmere Road, Shrewsbury

VISION DOCUMENT

July 2019

BARWOOD
LAND



This document is the property of FPCR Environment and Design Ltd and is issued on the condition it is not reproduced, retained or disclosed to any unauthorised person, either wholly or in part without the written consent of FPCR Environment and Design Ltd.

Ordnance Survey material - Crown Copyright. All rights reserved. Licence Number: 100019980 (Centremapslive.com).

Aerial imagery © 2019 Bluesky, DigitalGlobe, Getmapping plc, Infoterra Ltd and Bluesky. Map data © 2019 Google

Rev	Prepared / Date	Approved / Date
D	DRAFT KAD / AT 05 July 2019	MGH / 05 July 2019
E	KAD / AT 18 July 2019	MGH / 18 July 2019

FPCR Environment and Design Ltd, Lockington Hall, Lockington, Derby, DE74 2RH ■ t: 01509 672772 ■ f: 01509 674565 ■ e: mail@fpcr.co.uk ■ w: www.fpcr.co.uk
masterplanning ■ environmental assessment ■ landscape design ■ urban design ■ ecology ■ architecture ■ arboriculture ■ graphic design

K:\8400\8401\LANDS\Vision Doc\8401_Vision Doc Revision E.indd

CONTENTS

CHAPTER 1 INTRODUCTION	p.4
CHAPTER 2 SITE LOCATION & CONTEXT	p.6
CHAPTER 3 THE SITE	p.10
CHAPTER 4 NORTH WEST RELIEF ROAD	p.12
CHAPTER 5 PLANNING POLICY CONTEXT	p.14

CHAPTER 6 TECHNICAL CONSIDERATIONS	p.18
CHAPTER 7 SITE ANALYSIS	p.24
CHAPTER 8 CONCEPT DEVELOPMENT	p.26
CHAPTER 9 MASTERPLAN	p.28
CHAPTER 10 CONCLUSIONS	p.36



CHAPTER 1

INTRODUCTION

The land at Ellesmere Road lies immediately north east of the existing settlement edge within easy reach of Shrewsbury town centre.

The on-going preparation of the Shropshire Local Plan Partial Review provides an opportunity for the Council to consider strategic options to deliver new development. Barwood Land wish to engage in this process and present a potential residential development site off Ellesmere Road, Shrewsbury.

Barwood Land has commissioned a range of technical analyses and a preliminary masterplanning exercise. This has enabled a vision for the land to begin to develop.

The purpose of this Vision Document is to:

- Describe the results of the technical analysis undertaken;
- Explain how the site could be developed; and
- Identify a number of the benefits that development of the land could deliver.

This document is intended to inform the basis of discussions which will hopefully enable the proposals to be refined and be supported through the review of the Local Plan.

VISION

Development of Land at Ellesmere Road will provide a high quality, sustainable neighbourhood in an exceptional location close to Shrewsbury Town centre. Residents will be well connected to nearby key public transport hubs. The development will reflect ambitions for the town in the light of the planned new north west relief road and renewed focus on growth in Shrewsbury. It will draw upon the distinctive character of Shrewsbury whilst reflecting the way people want to live today.



Plan illustrating site location

CHAPTER 2

SITE LOCATION & CONTEXT

The Ellesmere Road site lies adjacent to existing residential areas, approximately 2 kilometres to the north of Shrewsbury town centre.

Location and Context

The site extends to approximately 23 hectares in area. It is located approximately two kilometres north of Shrewsbury town centre. Ellesmere Road runs from the north directly past the site towards the town centre.

Ellesmere Road runs along the eastern site boundary, marked by a mature roadside hedgerow and trees, with residential development beyond to the east. To the south and east of the site are existing housing areas of Shrewsbury that wrap around the site and contain it, along with the Shrewsbury to Chester railway line defining the western boundary. To the south are properties off Cedar Drive, and at the recent housing development off Juniper Road.

The north of the site is enclosed by a wide swathe of existing vegetation. Beyond which Hencote hotel and vineyard is located further to the north on a hill overlooking the site.

Hencote Dairy located off Ellesmere Road is situated adjacent to the north eastern corner of the site. Further south along Ellesmere Road is Winney Hill View, a recent Cul-de-Sac development of ten dwellings, which extends westwards from the road.



- 1) View of eastern site boundary along Ellesmere Road with the Winney Hill View Development visible
- 2) View south from the site towards properties off Ellesmere Road and Cedars Drive
- 3) View towards the site's southern boundary
- 4) View of Hencote Dairy with the Winney Hill View Development seen beyond

CHAPTER 2 SITE LOCATION & CONTEXT



Site location in relation to surrounding regional context



Aerial Photograph

CHAPTER 2

SITE LOCATION & CONTEXT

Connectivity to Local Services

The site is approximately 2km from Shrewsbury town centre. The town centre and area surrounding the site provides a good range of local facilities and amenities including:









- Town centre shops and shopping centres;
- Restaurants;
- Cinema;
- Bars, pubs and cafés;
- Range of independent shops;
- Post Offices;
- Pharmacies;
- Doctor's surgery;
- Library;
- Churches;
- Sports facilities;
- Theatre;
- Hairdressers;
- Supermarkets;
- Public open spaces; and
- Employment opportunities.



- 1) Bus stop along Ellesmere Road, adjacent to the site
- 2) Cycle / pedestrian route off Ellesmere Road
- 3) Shrewsbury town centre
- 4) Shrewsbury Train Station

Greenfields Primary School off Ellesmere Road is approximately 700m from the site. The nearest secondary school is Shrewsbury Academy with the Worcester Road campus located approximately 1.2km north of the site and the Cordon Crescent campus approximately 2km east. On this basis, we conclude that there is available access to both primary and secondary education facilities in the surrounding area.

In terms of accessibility to public transport, the nearest bus stop is located on Ellesmere Road adjacent to the site. This bus stop provides a regular service to Shrewsbury town centre (510) (5 buses per day on Monday to Saturday).

-  Distance Radii
-  Town Centre and Associated Facilities
-  Primary School
-  Secondary School
-  Nursery
-  Medical Centre
-  Local Shops and Supermarkets
-  Post Office Branch
-  Restaurant/Café/Takeaway
-  Community Centre
-  Place of Worship
-  Hotel
-  Public House
-  Library



Plan showing the site and location of local services

CHAPTER 3

THE SITE

Existing Use

The site is arable agricultural land. Most of the site forms a large open field, with a further smaller fields separated by hedgerows and hedgerow trees. A small number of scattered trees are situated within the fields. Trees and hedgerows can also be found along the site boundaries. The site is not publicly accessible and there are no Public Rights of Way through the site.



1) View of trees within site

2) View south of eastern site boundary with Ellesmere Road

3) View looking south across site with the Winney Hill View development visible

4) View south west of the site with properties off Cedars Drive visible

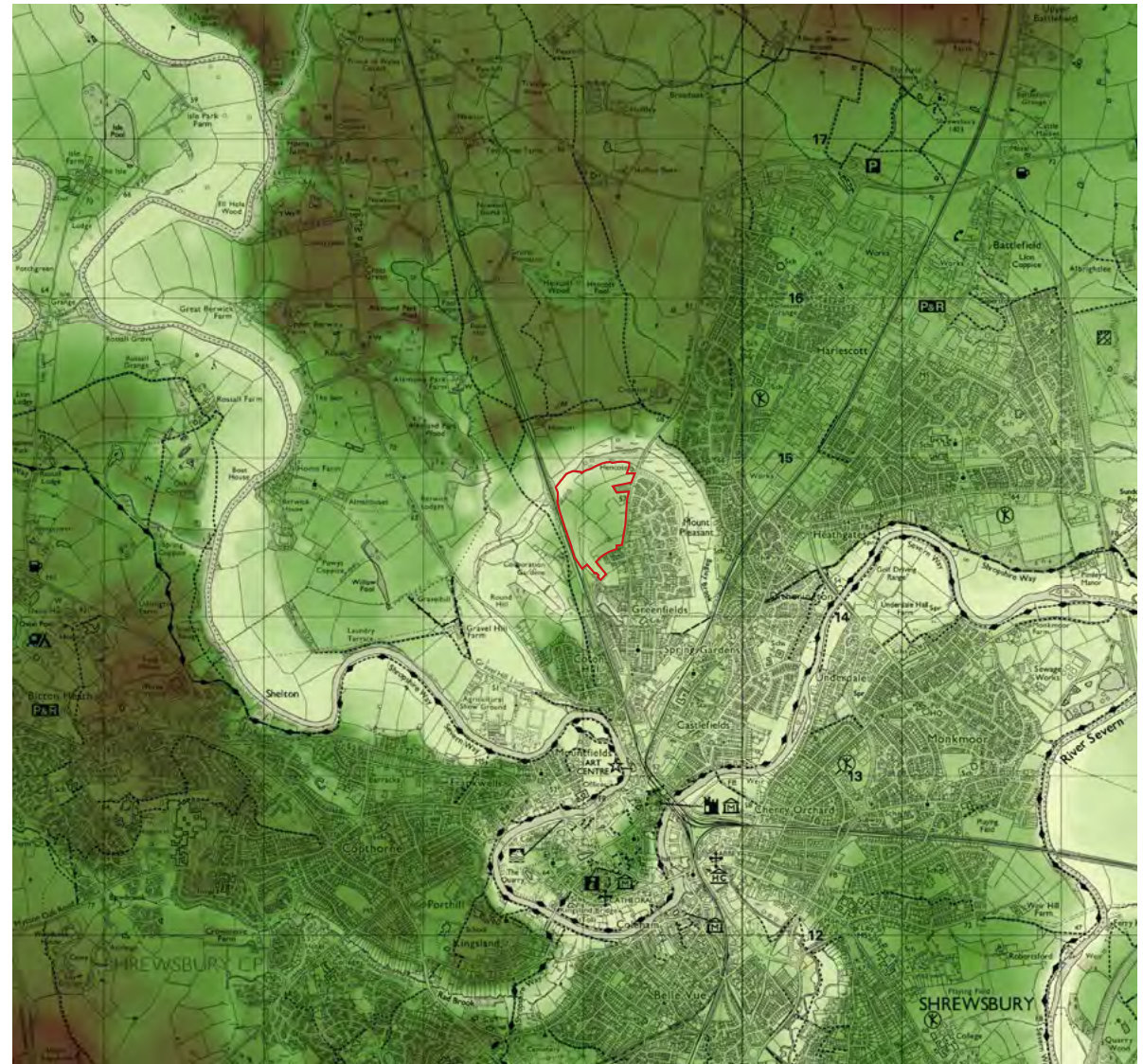
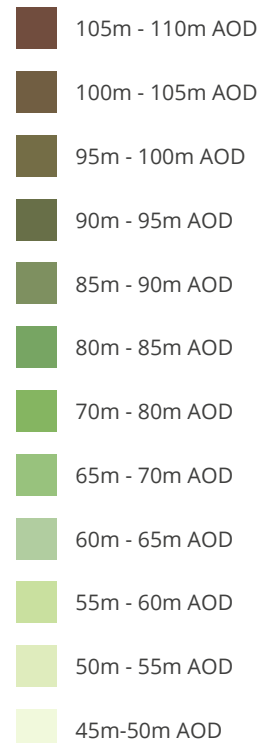
CHAPTER 3 THE SITE

Topography

The local landform rises gently from the settlement edge towards the centre of the site, reaching approximately 65AOD. From here the topography slopes gently northwards, descending towards the water course located to the north of the site.

Within the wider landscape land rises again to the north of the water course creating a ridge which encloses the site. Beyond the ridge topography to the north is typically undulating. To the west the landform remains relatively flat until beyond the river Severn where land rises towards the Shelton area of the town. Existing development to the east and south of the site lie on similar contours to the site.

The river Severn creates a gentle valley which meanders through the centre of the town into the landscape beyond.



Plan illustrating site topography

CHAPTER 4

NORTH WEST RELIEF ROAD

Relief Road: Scheme

The North West Relief Road (NWRR) scheme by Shropshire Council has been granted government funding and is now proposed to start being constructed in 2022. It will provide a new single carriageway road linking the northern and western parts of Shrewsbury. To do so, the road will cross the River Severn and Shrewsbury to Chester railway line.

Once complete the NWRR will be a 7.3m single carriageway, all purpose road with a 60mph speed limit. A shared footway / cycleway and crossing points will be provided to safely connect pedestrians and cycle routes.

The NWRR scheme has been developed with the primary aim to improving the existing highway network within Shrewsbury. Currently, the links between the

north and west of Shrewsbury are poor, with the most direct route between them via the medieval streets of Shrewsbury town centre. As a result, Shrewsbury suffers from significant levels of congestion.

Relief Road: Opportunities

Within the Outline Business Case, it is noted that the NWRR offers the opportunity for significant improvements within Shrewsbury, including:

- Provide a more direct route for trips travelling between the north and west of Shrewsbury, reducing the number of vehicles travelling through Shrewsbury town centre by approximately 14% and 30% in the peak hours;
- Improve the current levels of congestion and air quality within Shrewsbury town centre;
- Improve journey times on routes within Shrewsbury, and the reliability of these conditions by all modes of transport (public and private);

- Enhance road safety by reducing the number of vehicles rat-running on unsuitable rural roads; and
- Improve the resilience of the wider Shrewsbury transport network.

The NWRR also provides the opportunity for future growth within Shrewsbury. With new development already underway at the Southern Sustainable Urban Extension (SUE) and further growth planned as part of the Western SUE, Shrewsbury is set for a significant level of growth. The NWRR would also open up land to the north of Shrewsbury for sustainable growth.

CHAPTER 4
NORTH WEST RELIEF ROAD



Plan illustrating proposed relief road route with site boundary shown

CHAPTER 5

PLANNING POLICY CONTEXT

The Ellesmere Road site is being promoted for development in the context of the recently revised national planning policy and guidance and a local policy framework which is evolving.

National Planning Policy Framework (NPPF)

The National Planning Policy Framework (“NPPF”) sets out the Government’s planning policies for England and how these should be applied. It is a material consideration in planning decisions.

The current version of the NPPF was published in February 2019. It requires local planning authorities (“LPAs”) to prepare plans to achieve net gains across three sustainable development objectives: an economic objective, a social objective and an environmental objective (Paragraphs 8 and 9). Applications for sustainable development should be approved wherever possible (Paragraph 38).

Paragraph 23 of the NPPF requires local planning authorities to plan for and allocate sufficient sites to deliver their strategic priorities. As a minimum, strategic policies should provide for objectively met needs

for housing and other uses, unless there are strong reasons to restrict development or the adverse impacts would significantly and demonstrably outweigh the benefits (Paragraph 11).

To support the Government’s objective of significantly boosting the supply of homes, the NPPF says it is important that a sufficient amount and variety of land can come forward where it is needed (Paragraph 59). Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (Paragraph 103).

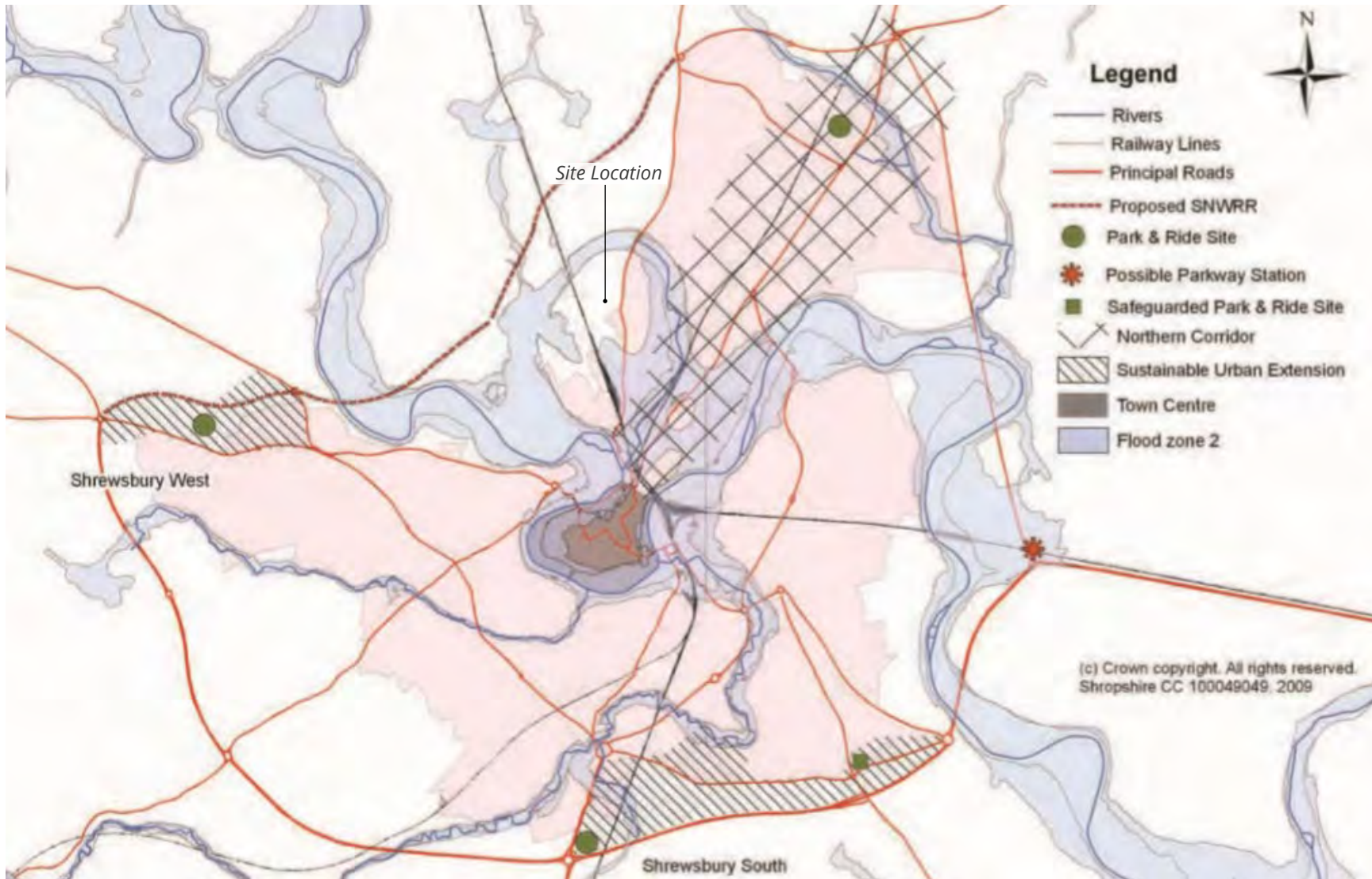
The Development Plan

The Site is located within the administrative boundaries of Shropshire Council, where the statutory development plan comprises the Shropshire Core Strategy (adopted in February 2011) and the Site Allocations and Management of Development Plan (“SAMDev”) (adopted in December 2015). Both documents cover the period from 2006 to 2026.

Core Strategy policy CS1 sets out the Council’s strategic approach to development. Shrewsbury is to be the primary focus for development, providing approximately 6,500 (25%) of the Council’s 27,500 proposed new homes in the plan period to 2026. A combined 40% of residential development is allocated to the Market Towns and other Key Centres, with the remaining 35% expected to be accommodated in rural areas. The policy maps accompanying

the adopted development plan documents place the Site adjacent to but outside the development boundary of Shrewsbury.

Policy CS6 sets out sustainable design principles that should be achieved by all development. Among other things, it requires development to be designed to a high quality and to contribute to the health and wellbeing of communities, including achieving local standards for the provision and quality of open space, sport and recreational facilities. SAMDev policy MD2 requires the provision of open space which should comprise an area of functional space for play, recreation, formal or informal uses including semi-natural open space.



Shrewsbury Key Diagram from the Shropshire Core Strategy with Site Location Labelled

CHAPTER 5

PLANNING POLICY CONTEXT

Emerging Development Plan

The Council is in the process of conducting a partial review of its development plan, to extend its life to 2036. The Council consulted on a Local Plan Review Preferred Sites Document (“PSD”) between November 2018 and January 2019.

The PSD outlines an ‘urban-focused’ preferred development strategy, concentrating 30% of development on Shrewsbury, being 5% more than under adopted policy. In Shrewsbury, additional provision of 3,646 homes is required in addition to past completions and existing commitments and allocations. Of these 3,646 homes the PSD allocates sites for only 2,150, expecting the remaining 1,496 homes to come forward on other, currently unidentified, sites within the town’s settlement boundary.

Representations have been submitted to the consultation on the PSD, supporting the overall strategy proposed, but recommending that the Council identifies more sites in and around Shrewsbury to provide a clear strategy to deliver sufficient homes to meet local needs and that the development site is allocated for development.

The need for the PSD to consider additional allocations has been further enhanced following the announcement of Government funding for the North West Relief Road (“NWRR”) in April 2019. This road which is due to open in 2023, and be fully completed by Spring 2024, will have a material impact on the spatial growth strategy, especially to the north and east of Shrewsbury, where road capacity has previously been constrained.

Shrewsbury Big Town Plan

Shropshire Council, Shrewsbury Town Council and Shrewsbury Business Improvement District together published the Shrewsbury Big Town Plan (“SBTP”), a non-statutory document, in July 2018.

The SBTP presents a joint vision for the evolution of Shrewsbury up to 2036, including broad aspirations and development goals and an outline of major development opportunities, priority projects and initiatives.

The vision laid out in the SBTP includes aspirations to balance peripheral growth by encouraging and promoting growth in and around Shrewsbury town centre, redressing a recent tendency for development to be focused near the boundaries of the town, and to ensure Shrewsbury remains compact to facilitate the development of efficient physical and business networks.



Other Considerations

The evidence underpinning the Council's emerging local plan review assumes that road capacity to the north of Shrewsbury town centre will remain constrained throughout the extended plan period. However, the recent announcement that central government funding has been secured towards the development of the proposed NWRR, as noted previously, necessitates a review of the sustainability potential and deliverability timescales for sites north and east of the town centre. The NPPF requires strategic policies to anticipate and respond to long-term requirements and opportunities such as those arising from major improvements in infrastructure, and this land off Ellesmere Road is exceptionally well located, close to the town centre, to maximise the benefit from that infrastructure investment in a highly sustainable location.

A September 2018 Shropshire Open Space Recreation Needs Assessment concluded that existing open space standards should be retained while the Council gathers data to be used as the basis for setting new standards that take into account the overall quality, accessibility and connectivity of the wider network of open spaces.

The Council is in the process of producing a Shrewsbury Design Charter, which will set out requirements for development in Shrewsbury with a view to improving design quality.

CHAPTER 6

TECHNICAL CONSIDERATIONS

The environmental and technical capacity of the site has been investigated, through both site assessment and desk study.

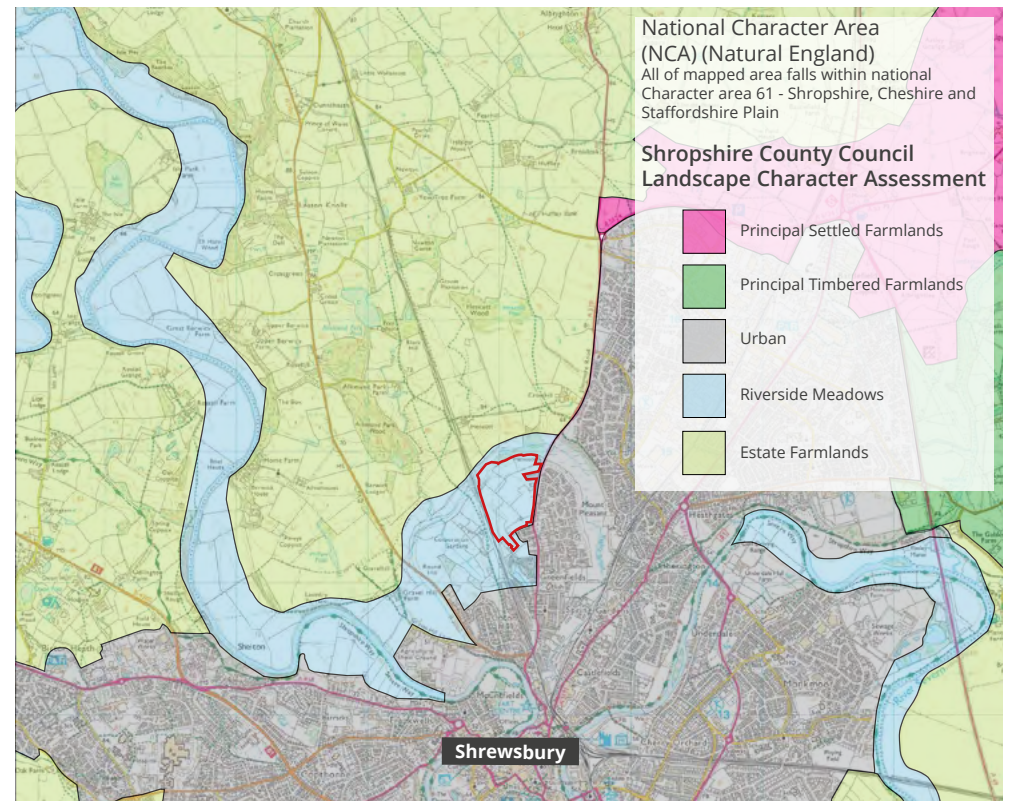
Landscape Character

At a national level, the site lies within the National Character Area 61, Shropshire, Cheshire and Staffordshire Plain as defined by Natural England. Shropshire Council's Landscape Character Assessment 'The Shropshire Landscape Typology' was undertaken in 2006. The site lies within the area described as "*Riverside Meadows*", the key characteristics described in the assessment for this landscape type are; flat floodplain topography, pastoral land use, linear belts of trees along watercourses, hedge and ditch field boundaries and unsettled.

The area surrounding the site displays some of these characteristics such as linear tree belts and relatively flat topography. However, the site's use is arable rather than pastoral and is influenced by development on the existing settlement edge including recent development at

Winney Hill View. Nevertheless, there is the opportunity to strengthen the Riverside Meadows character, through new Green Infrastructure.

The more immediate landscape of the site is located within a relatively enclosed position on the north western edge of Shrewsbury. The site is influenced by existing suburban settlement and road network located to the east and south and new development at Winney Hill View, views of which are prominent from within the site. Views are also available of Hencote Vineyard which situated on rising land to the north of the site. The site is also influenced by the railway line which sits on top of a small embankment adjacent to the site's western boundary. To the north the site is enclosed by vegetation located within a former river bed.



Plan illustrating landscape character classifications

Visual Context

The site is visually well enclosed to the east and south by existing built form. To the north views are available from rising land situated beyond the former river bed, this rising land also acts to enclose the site, restricting views from further northwards. To the west beyond the railway line the landscape is more open allowing for views towards the site, however, there are a very limited number of visual receptors located to the west of the site, most notable of which is PROW 0443/91/1 which runs adjacent to the railway.



Photo Viewpoint Location Plan



PHOTO VIEWPOINT 1: View from within the site looking south west



PHOTO VIEWPOINT 2: View looking south to Shrewsbury from adjacent to PROW along Hencote Lane

CHAPTER 6

TECHNICAL CONSIDERATIONS

Ecology

Land within the site largely comprises managed arable land and species-poor improved grassland fields. Additional habitats present include native species dominated hedgerows, scrub and mature trees and an area of semi-improved / wet grassland.

The majority of habitats within the site are of negligible or low nature conservation value. The hedgerows, trees and associated scrub are however considered to be of nature conservation value within a site/local context. The site also encompasses an area of wet grassland to the northwest that forms the southernmost section of the Old River Bed Shrewsbury Local Wildlife Site (LWS) (non SSSI - Hencott Section). The wider LWS is characterised by a peat filled old river bed supporting marsh and

damp grassland and sedge flora with unimproved pasture.

The Old River Bed Shrewsbury SSSI is situated c.70m to northeast of the site and located to the opposite side of Ellesmere Road/A528.

With the exception of some minor loss of hedgerow and a small number of trees, all of the features of nature conservation value could be retained within development proposals.

The development could deliver a range of new habitats and retain existing features of nature conservation value.

Flood Risk and Drainage

Flood Risk

The majority of the site is located within Flood Zone 1 on the Environment Agency Flood Map for Planning. It is, therefore, at low risk of fluvial flooding and suitable for residential development.

A small area in the north of the site falls within flood zones 2 and 3 and therefore have a medium or high probability of flooding. This area lies adjacent to the site's northern boundary and forms part of a flood plain for a watercourse which runs to the north of the site.

Drainage

Surface water from the proposed development will need to be drained by a Sustainable Drainage (SuDs) scheme that will be designed in detail as part of the masterplan. The proposed SuDs will need to be integrated with landscape proposals and assist in enhancing amenity and biodiversity on the site. Surface water attenuation features including attenuation ponds could also be used to manage the flow of surface water.

Foul water from the proposed development will need to discharge into an existing public foul sewer. The development design will, therefore, need to incorporate any requirements related to the disposal of foul water.

CHAPTER 6
TECHNICAL CONSIDERATIONS



Environmental Agency (EA) Flood Map



Examples of attenuation basins with habitat creation

CHAPTER 6

TECHNICAL CONSIDERATIONS

Highways and Accessibility

Accessibility

The site benefits from good road frontage to Ellesmere Road, providing excellent opportunities for direct access into the site, whilst reinforcing the street scene character along this route. Ellesmere Road also provides easy vehicular access into the town centre and surrounding areas of the town.

The site is highly accessible by sustainable modes of transport, with the surrounding area having good levels of pedestrian and cycling infrastructure and a good level of accessibility to public transport.

There are existing bus stops along Ellesmere Road adjacent to the site which provides a regular service (5 buses per day, Monday to Saturday) between Shrewsbury, Myddle and Ellesmere. Connections are provided

along this route to Shrewsbury Bus Station, located approximately 1.8km to the south of the site from which a wide range of bus services are provided. Approximately 250m from the Bus Station is situated Shrewsbury Train Station, providing opportunities for journeys utilising both bus and train routes.

The site is also well connected to local services and facilities by walking and cycling. Shrewsbury town centre is accessible within approximately 2km walking distance of the site, also within walking distance are Greenfields Primary School, Shrewsbury Academy and Shrewsbury Bus Station. Shrewsbury railway station is located approximately 1.7km to the south of the site, equating to an approximate 20-minute walk/8 minute cycle, and is therefore within walking and cycling distance for commuters.

Signposted pedestrian and cycle routes are available along and off Ellesmere Road providing safe routes to the town centre and other areas of the town, including:

- Herongate;
- Greenfields;
- Coton Hill;
- Heath Farm; and
- Hartlescott.

The local cycle route on Hemsworth Way and Hubert Way runs south whereby it connects to Shrewsbury Station and onto National Cycle Network (NCN) Route 81. Public Right of Way (PROW) 0443/95/3 runs approximately 500m to the north of the site on Hencote Lane, providing connections onto the wider PROW network.

The scale of the site means that we would be preparing a Travel Plan. This would assist in promoting the use of sustainable modes of transport and reduce reliance on the private car.



Plan illustrating the local movement network

CHAPTER 7
















SITE ANALYSIS

The technical analysis of the site and its context undertaken to date has identified a number of constraints, that will influence and help shape the development. Importantly none of these have been identified as barriers to development in principle. It is also clear that the site presents a number of opportunities associated with potential development. These are described below and illustrated on the constraints and opportunities plan where appropriate.

This analysis of constraints and opportunities has informed the development proposals.

The key constraints are as follows:

- Long distance views from the PRowS located to the north and west of the site;
- Existing hedgerows and trees within and along the site boundaries;
- Area of flood risk associated with the watercourse to the north;
- Railway line to the west of the site;
- SSSI located to the north east of the site;
- Local Wildlife Site (LWS) located to the north of the site and partly within the north western portion of the site.
- The site is visually contained by existing development, landscape and topography.
- The opportunity to create a strong landscape framework which would supplement existing trees and hedgerows and enhance biodiversity with new native tree, hedgerow, structural and amenity planting.
- The ability to create high quality public open spaces for use by existing and proposed residents on previously publicly inaccessible land.
- The ability to create safe, well considered, connection points into the local road network including a pedestrian connection to the bus stop on Ellesmere Road.
- The potential to link the new neighbourhood close to the centre of Shrewsbury.
- The opportunity to utilise connections with existing bus stops and the public transport network including local cycle routes.
- Walkable route to Greenfields Primary School.
- The topography of the site provides an opportunity for sustainable drainage provision which would assist in terms of habitat creation and creating attractive, distinctive spaces.

-  Existing Hedgerows / Trees
-  Existing Contours
(Ordnance Survey Information)
-  Existing Contours
(High Points of Site)
-  Existing Contours
(Low Points of Site)
-  Greenfields Primary School
-  Bus stops on Ellesmere Road
-  Existing Public Rights of Way
-  Existing Watercourse
-  EA Floodzone
(Flood Zone 3)
-  EA Floodzone
(Flood Zone 2)
-  Railway Line
-  Potential Views from Public Rights
of Way
-  Old River Bed, Shrewsbury SSSI
-  Old River Bed, Shrewsbury LWS
-  Ellesmere Road



Plan illustrating key existing constraints

CHAPTER 8

CONCEPT DEVELOPMENT

The proposals have been developed through an iterative design process, informed by site surveys, desk-based research and assessment of local and national planning guidance.

Design Evolution

The masterplanning process has considered the inherent and underlying characteristics of the site and how these should shape and structure the development, including the location and extent of the built environment and green infrastructure.

The extent of built development and has been strongly influenced by the site's context and existing vegetation. This resulted in built development being guided close to the existing settlement edge with green infrastructure focused in the north and west of the site.

Existing vegetation been integrated and retained wherever possible with existing hedgerows forming green corridors along the Ellesmere Road and within the proposed development areas. Existing trees have also been used to create focal green spaces within the development.

Key Design Principles

From this process a series of Key Design principles have been developed :

- To create an attractive neighbourhood of high quality design, drawing on the best features of local distinctiveness within Shrewsbury.
- To retain and integrate existing site features into the layout wherever possible.
- To provide a well-connected development, both in terms of vehicular access, but also public transport and cycling/walking connections.
- To establish an easy to use scheme, where residents and visitors can easily find their way around.
- To make Green Infrastructure an integral part of the scheme, by creating a network of multifunctional green spaces for the benefit of residents, wildlife and the wider landscape.
- To provide good opportunities for healthy outdoor recreation, exercise and play.
- To manage surface water in a sustainable manner using SUDS, which can improve biodiversity and the distinctiveness of open spaces.
- To provide a good choice and mix of housing.

CHAPTER 8 CONCEPT DEVELOPMENT



CHAPTER 9

MASTERPLAN

Green Infrastructure

The provision of high quality green infrastructure has been a fundamental part of the vision for the site.

The strategy will maintain a substantial green 'buffer' along the northern and western edges of the site as well as a green corridor along Ellesmere Road. These areas will reinforce and connect to existing habitats including the LWS to the north of the site.

A well-connected mosaic of spaces will be created for recreation, play and habitat creation which will benefit wildlife as well as the existing and proposed community.

The Green Infrastructure will comprise of:

- Open space to the north and west of the site integrating: new footpaths, SUDs and play space;
- The provision of a central community green and play area within the development area which will provide a focal point for activity;
- Focal green spaces centred around retained trees;
- Areas of new woodland planting and landscaping;
- Green corridors running along Ellesmere Road and through residential zones, created around retained and proposed hedgerows and trees to aid legibility;
- Retention of hedgerows along site boundaries;

- Habitat creation to complement the LWS;
- Series of proposed wildlife ponds along the western boundary to provide habitat connectivity; and
- An area in the north of the site for a potential community orchard.





Green Infrastructure

CHAPTER 9

MASTERPLAN

Land Use and Development

The Framework Plan (on page 35) shows residential parcels covering approximately 14.30 hectares of the site. This is split into two phases; phase one of the development is located in the southern most portion of the site with phase two adjoining to the north. The design provides approximately 8.62 hectares of open space, including space for recreational use and habitat creation. It is envisaged that residential areas will have an average density of 35 units per hectare - providing approximately 500 residential units dependent on the final design solution, mix and density.

The vast majority of dwellings within the surrounding area are up to 2 storeys in height and, as such, the development will seek to broadly reflect this in its scale. Buildings within the site will not typically exceed 2 1/2 storeys - reaching a maximum height of 10.5m.

Despite this upper limit, buildings will be designed to have a variation in their height from ground to ridge or eaves, and the arrangement of buildings within a plot should seek to ensure subtle changes in height to create a varied roof line across the development.

The building typology will reflect the site's landform and will be used to highlight key nodes and focal points. For example, the careful use of taller 2 1/2 storey buildings will be used to highlight focal spaces.



The density will vary throughout the development, with higher densities concentrated to the southern and central areas and the lower densities on the peripheries



Changes in roof height will create a varied roof line throughout the development

CHAPTER 9

MASTERPLAN

Movement Framework

Vehicular access to the site will be provided via two proposed accesses off Ellesmere Road. The southernmost access will serve phase one of the development with the second access proposed to be constructed as part of phase two.

Within the development a clear and legible hierarchy of routes would be provided, to allow easy access. Once phase two is completed the two points of access would be linked by a primary street which would also connect to development parcels via a series of secondary and tertiary streets.

This site masterplan has been developed upon a well connected movement framework that links the development parcels to key destinations. Vehicular movement through the site is supplemented by attractive sustainable routes for

cycling, walking and accessing public transport.

A good range of public transport is accessible close by with a direct link provided to bus stops on Ellesmere Road. Connections to Ellesmere Road will also provide cycle and pedestrian access to Shrewsbury town centre, Bus Station and Train Station as well as the PRow network to the north.

The Framework Plan (on page 35) shows a network of pedestrian/cycle routes through a connected pattern of streets, footpaths and open spaces. The overall strategy will encourage the community to walk and will promote healthy active living. The street design will also include footways which prioritise the safe and easy movement of pedestrians and cyclists through the development.



New linkages to the existing Public Rights of Way and through the development will encourage walking and will promote healthy active living



Access and Movement

Framework Plan and Development Form

The Framework shows built development located to the south of the site extending northwards level with existing development on Ellesmere Road. Development has been set back from the LWS to the north and the railway to the west.

Phase one of the development is located in the southern most portion of the site with phase two adjoining to the north.

A substantial area of the site will remain free of built development to provide a landscape buffer to the countryside beyond, ecological enhancements and multifunctional public open space. Existing vegetation has been retained where possible and breaks up the development area with green corridors and focal green spaces centred on retained trees.

- 01 Proposed Residential Development: 14.30Ha (up to 500 dwellings)
Phase 1: 5.72ha (200 dwellings at 35dph)
Phase 2: 8.58ha (300 dwellings at 35dph)**
- 02 Proposed Site Accesses**
- 03 Proposed Indicative Street**
- 04 Proposed Footpath Routes**
- 05 Existing Vegetation/Hedgerows**
- 06 Proposed Tree/Shrub Planting**
- 07 Proposed Public Open Space**
- 08 Indicative Attenuation Basins**
- 09 Locally Equipped Area for Play (LEAP): 0.05Ha**
- 10 Neighbourhood Equipped Area for Play (NEAP): 0.10Ha**
- 11 Potential Pedestrian Link to Bus Stop on Ellesmere Road**
- 12 Proposed Phase 1, Phase 2 Boundary**
- 13 Potential Community Orchard**
- 14 Proposed Wildlife Ponds**



Illustrative Framework Plan

CHAPTER 10

CONCLUSIONS

The site has good connections to Shrewsbury town centre and key public transport hubs. It is, therefore, a suitable sustainable location for development in the town.

The site offers a great opportunity to provide a high quality development in close proximity to Shrewsbury town centre.

The vision for the Land at Ellesmere Road, Shrewsbury is to deliver a development which is high quality, well connected, attractive and which reflects ambitions for growth in Shrewsbury.

The vision for the site has been developed having regard to a range of technical assessments which have given a thorough understanding of the site's constraints and opportunities. The Development Framework which has emerged from this process is carefully considered and positively responds to the policy framework and the wider context within which the site is located.

It is clear from the analysis that subject to the mitigation identified in this document there are no significant technical constraints to residential development on the land in the form envisaged.

The site is in a highly accessible location within walking distance of facilities and services in the town centre, Shrewsbury Train station and Shrewsbury Bus Station.

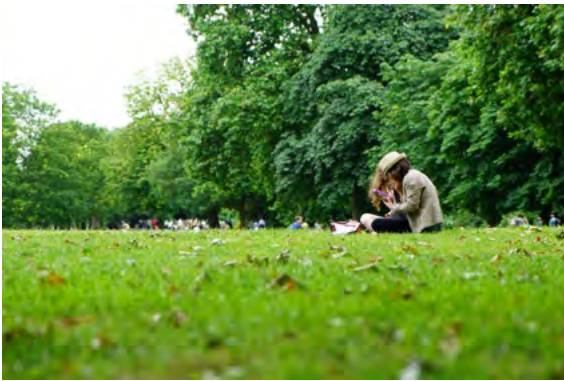
There is also scope for the site to deliver a significant range of benefits, including:

- the creation of significant areas of high quality publicly accessible open space on land which currently has no public access;

- the potential to provide significant areas of planting and habitat creation connecting into the existing green infrastructure network;
- add to the local population which can support the vitality of the community and the viability of existing services and facilities including the many independent businesses in the town centre;
- a neighbourhood which reflects the distinctive characteristics of Shrewsbury;
- the delivery of a choice and mix of housing including affordable housing.

The vision for the site is to deliver a high quality development set within a robust green infrastructure network. We believe that this document and the Development Framework for the site demonstrate this vision is a deliverable proposition.

CHAPTER 8 CONCLUSIONS



Land at Ellesmere Road, Shrewsbury
VISION DOCUMENT

APPENDIX 4: Mineral Resource Assessment

Mineral Resource Assessment

Land off Ellesmere Road, Shrewsbury

On behalf of: Barwood Development Securities Limited



Prepared by:

Sam Betteley MSc

Surveyor – Minerals & Waste Management

For and on behalf of Carter Jonas

Peer Reviewed by:

Paul Clarke MRICS MIQ

Surveyor – Minerals & Waste Management

For and on behalf of Carter Jonas

Approved by:

David Sandbrook BSc FRICS MRTPI FIQ MCIWM

Partner – Head of Minerals & Waste Management

For and on behalf of Carter Jonas

Contents

1	Introduction.....	3
2	Sources of Information	4
3	Geology	4
4	Mineral Planning.....	8
5	Conclusion.....	12

Appendices

1	Site Location Plan
2	Topographical Survey (Ref: 35420_T Rev 0; dated December 2019)
3	Indicative Resource Plan

1 Introduction

This report has been prepared in accordance with instructions dated 6th January 2020 from Barwood Development Securities Limited (the 'Client') to prepare a mineral resource assessment in support of development on Land off Ellesmere Road (A528), Shrewsbury (the 'Property'). We understand that the Property currently comprises 22.95ha of mixed agricultural and grassland. A location plan is shown at Appendix 1. In the absence of detailed development proposals, it has been assumed that the Property is to be developed for a residential end-use including gardens, soft landscaping and infrastructure. The Property has not been inspected as part of this desktop assessment.

The Property is located approximately 1.75km to the north of Shrewsbury town centre. The Property's northern boundary is formed by an area of steeply inclined woodland with further agricultural land to the North. The Property's Western boundary is delineated by the Shrewsbury to Chester Railway line which runs in a north-westerly direction on an embankment. Dense urban-fringe residential developments are situated along Ellesmere Road and Juniper Road, which bound the Property to the South and West. Winney Hill View, a small '*cul-de-sac*' off Ellesmere Road (comprising 10 dwellings) indents the Property's boundary to the northeast.

The Property is currently accessed from Ellesmere Road via a small (ungated) agricultural entrance. We have been provided with a topographical survey of the Property dated December 2019 (see Appendix 2), which shows the Ellesmere Road entrance to be the highest point of the Property (spot levels c.65mAOD). The Property slopes downwards from this point in all directions toward the northern, southern and western boundaries.

The Property is almost entirely (save for a small section of woodland in the north) located entirely within a Mineral Safeguarding Area (MSA) for Sand & Gravel which has been identified within Shropshire Council's (SC) '*Site allocations and Management of Development (SAMDev)*' plan, which was adopted on the 17th December 2015. MSAs are used to ensure that '*...known mineral resources are not sterilised by other forms of development...*'. However, such a designation '*...does not imply that any application for the working of minerals within them will be granted planning permission*'. SC is the relevant Mineral Planning Authority in accordance with the Town and Country Planning Act 1990.

Applications for non-mineral development which fall within MSA's '*...must include an assessment of the effect of the proposed development on the mineral resource beneath or adjacent to the site of the development or the protected mineral handling facility (termed a Mineral Assessment)...*'. This report is intended to fulfil that requirement and has been compiled in accordance with the '*Mineral Safeguarding Practice Guidance*' produced by The Mineral Products Association and The Planning Officers' Society.

2 Sources of Information

The following information has been utilised within this report:

- British Geological Survey (BGS) Mineral Assessment Report No.90 *'The sand and gravel resources of the country around Shrewsbury Shropshire'* dated 1982;
- BGS Technical Report WF/98/6 *'Mineral Resource Information for Development Plans – Shropshire: Resources and Constraints'*;
- BGS 1:50k Bedrock, Superficial and Linear Feature Mapping (Web Mapping Server);
- The National Planning Policy Framework (February 2019; Ministry of Housing, Communities and Local Government); and
- BGS Borehole Records.

In addition, a non-intrusive Phase I site Appraisal (Desk Study) by KAB Geo-Solutions Limited dated December 2019 has been provided by the Client.

3 Geology

Geologically, a distinction is made between *'superficial deposits'* and *'solid geology'*. Superficial deposits such as sand and gravel are found at, or close to, the surface. The solid bedrock beneath the superficial deposits is called the *'solid'* or *'bedrock'* geology.

Superficial deposits

Published geological mapping (1:25k) shows the property to be overlain by both Devensian glacial tills (diamicton) in the North and glaciofluvial sands and gravels to the South. A small (c.2 acres) area of alluvium deposits (clay, silt, sand and gravel) intersecting the Property's northern boundary has not been considered due its negligible surface area. The mapped superficial geology is shown at Appendix 3.

We have not been provided with the results of any previous site-specific intrusive investigations nor are we aware that such investigations works have taken place. However, BGS borehole records are available both within the Property boundary and in its immediate vicinity. These records are summarised in the table below and their location is shown at Appendix 3.

Within Site Boundary					
BGS Reference	Borehole	Borehole Title/No.	Record Type	Ground Level (mAOD)	Description
SJ41SE157		TT-01	Trial Pit	60.81	2m MADE GROUND. No water strike.
SJ41SE140		BH-11	Cable Percussion	59.74	0.55m TOPSOIL; 0.60m clayey fine to coarse GRAVEL; 0.85m CLAY, 4.55m clayey fine to coarse SAND with

				laminated bands of sandy silt; 1.35m CLAY. Water strike at ~10 mBGL
SJ41SE154	TP-06	Trial Pit	64.40	0.25m TOPSOIL; 0.55 clayey very sandy fine to coarse GRAVEL; 2.7m sandy GRAVEL; 0.5m CLAY. No water strike.
SJ41SE141	BH-12	Cable Percussion	62.64	0.6m TOPSOIL; 2.60m slightly clayey very fine to coarse sandy fine to coarse GRAVEL; 1.60m SAND; 5.45m silty fine SAND. Water strike at ~9.25 mBGL.
Outside Site Boundary				
SJ41NE51	BH-13	Cable Percussion	52.23	8m very silty fine and medium occasionally coarse SAND – Moderately Weathered Triassic Lower Mottled Sandstone/Kinnerton Sandstone Formation. Water strike at 1.33 – 3.74 mBGL.
SJ41SE155	TP-07	Trial Pit	51.70	0.75m MADE GROUND; 0.8m SILT; 0.4m PEAT; 1.35m gravelly CLAY; 0.7m sandy CLAY; 0.5m very clayey fine to medium SAND. Water strike at ~2 mBGL.
SJ41SE88	The Moveage	Shell and Auger	54	0.3m TOPSOIL; 1.2m TILL; 1.5m clayey GRAVEL(glacial); 1.0m TILL; 0.5+m SANDSTONE (Kinnerton Sandstone Formation). Water strike at 4 mBGL

Borehole SJ41SE88 (located c.65m to the east of the Property) was drilled by the BGS' Industrial Mineral Assessment Unit (IMAU) and has the additional benefit of grading charts showing the relative percentages of fines, sand and gravel. SJ41SE88 is incorporated within Mineral Assessment Report No.90 *'The sand and gravel resources of the country around Shrewsbury Shropshire'* which splits its study area into six arbitrary resource blocks. The Property is shown to have the lowest resource thickness within Block D (~1.5m); and is shown to have a fines composition of 11% against respective sand and gravel compositions of 30% and 59%.

We have made a high-level reserve assessment at the Property using the Desk Study information provided by the Client and the publicly available intrusive investigation data listed above. It should be noted that such an estimate involves the extrapolation of borehole logs over incredibly variable stratigraphic units. In order to accurately ascertain the composition of superficial deposits at the Property it would be necessary to undertake a site-specific intrusive investigation, including particle size distribution analyses.

Solid geology

Published geological mapping (1:50k) shows the property to comprise Triassic sandstones of the Kinnerton Sandstone Formation; formerly known as the Lower Mottled Sandstone.

These strata are not safeguarded by Shropshire's MSA and are therefore not considered further in this report.

High-Level Resource Estimate

Notional stand-offs have been applied to protect the amenity of residential buildings and woodland to the north of the property. A further 20m stand-off has been applied from the entirety of the site boundary to provide lateral and superjacent support to neighbouring properties.

We understand that preliminary discussions with Shropshire Council have indicated that a 100m stand-off from '*...any boundaries adjacent to railway land, roads, and residential properties*' would be acceptable. For completeness, we have utilised the considerably more conservative parameters below in order to give a definitive account of the resource's economic viability:

- An average deposit thickness of 2m;
- A bulk density for Sand & Gravel of 1.65m³;
- Processing losses at 15%;
- Residential amenity stand-off (from edge of dwelling) – 50m;
- Stand-off from woodland to the North of the Property – 20m; and
- Stand-off from the Shrewsbury to Chester railway line – 20m.

The recent topographical survey shows the Property to be bisected (north-south) by an overhead cable. In the event that the Property is subject to any major development scheme (residential or mineral) we have assumed that no mineral sterilisation has occurred and that the feature could be relocated under a '*lift and shift*' provision within the wayleave or easement agreement that facilitates the ongoing presence of the line. We recommend that the Client undertakes a full review of title at the Property.

The 2019 KAB Phase I site investigation report also alludes to the presence of gas pipeline marker posts to the north of the Property close to the boundary between the agricultural land and grassland '*...suggesting that a pipeline runs from north east to south west across this area*'.

Agreements dated 4th May 1982 and 24th February 1983 grant easements to The British Gas Corporation over a 45 foot wide (c.14m) corridor passing through Land Registry Title No's SL193598 and SL187196. Plans appended to those agreements show an indicative centreline for the pipeline running east to west across the northern portion of the Property. As a consequence, we have assumed a notional c.20m width of sterilised mineral to provide lateral support. The indicative sterilisation corridor is shown at Appendix 3.

The above pre-existing sterilisation splits the Property into two indicative resource blocks. These blocks are identified on Appendix 3 and high-level resource estimates are shown below:

Name	Surface Area (acres)	Volume (m ³) @ 2m Thickness	Tonnage
Indicative Resource Block A	9.4	76,072	106,690
Indicative Resource Block B	25	202,418	283,891
Total (inc. gas pipeline sterilisation)	34.4	278,490	390,582
Total (ex. gas pipeline sterilisation)	36.4	250,393	413,148

Indicative Resource Block A has a notional surface area of only 9.4 acres, an abnormal geometry and a width of less than 100m at its widest point. It is also situated less than 70m from the 'Old River Bed, Shrewsbury' SSSI. The Phase I site investigation report referenced previously notes that any extraction in the northern portion of the Property has the potential to 'affect the groundwater regime in the local area, which may have an impact on the condition of the SSSI site'. We consider that proximity to the SSSI effectively sterilises Block A and severely reduces the economic viability of Block B.

Access to Block A is constrained in all directions by neighbouring woodland, residential properties, the Shrewsbury to Chester Railway Line and the aforementioned pipeline route. Whilst we do not consider plant access over the gas pipeline to be insurmountable, it is likely that such a crossing (if permitted) would require significant reinforcement at an additional cost to the mineral operator; further devaluing an already marginal deposit. For clarity, we consider it is unlikely that Block A would be worked either in isolation, or in combination with Block B.

The surface area of Block B is also considerably reduced by the necessary stand-offs. The Block is landlocked in three directions and any potential extraction operation would require an access directly onto Ellesmere Road. Properties front onto the eastern side of Ellesmere Road for over 0.5km to the north and in both directions into the centre of Shrewsbury. In the absence of any alternative modes of transport, any potential mineral extraction operation is likely to require high volumes of Heavy Goods Vehicle (HGV) traffic over the course of the development.

In our opinion, it is highly unlikely that a suitable access could be provided onto Ellesmere Road without significant highways improvements. There is also potential that any Section 106/278 obligations would render mineral extraction uneconomic for such a small resource. Both blocks are located within close proximity to existing residential dwellings and a notional stand-off of 50m has been applied during our high-level resource estimate in order to protect their amenity. However, it is likely that any application for mineral extraction would lead to a recognised impact on background noise and dust levels and the 50m stand-off may need to be expanded to accommodate mitigation measures.

4 Mineral Planning

The Property is located within the administrative boundary of Shropshire Council (SC) which is the relevant Mineral Planning Authority. The current planning policy for mineral development in Shropshire is contained within the Core Strategy Development Plan Document (DPD) and the '*Site Allocations and Management of Development Plan*' (SAMDev).

The Core Strategy was adopted on 24th February 2011 and '*...sets out the strategic planning policy for Shropshire, including a 'spatial vision and objectives'*'. The SAMDev (adopted on the 17th December 2015) '*...sets out proposals for the use of land and policies to guide future development in order to help to deliver the Vision and Objectives of the adopted Core Strategy for the period up to 2026.*' The two documents together form Shropshire's Local Plan.

Policy MD16 relates to mineral safeguarding and MD16 (1) sets out the criteria which needs to be satisfied in order for a non-mineral application to be granted within a MSA:

- i. The applicant can demonstrated that the mineral resource concerned is not of economic value; or*
- ii. The mineral can be extracted to prevent the unnecessary sterilisation of the resource prior to the development taking place without causing unacceptable adverse impacts on the environment and local community; or*
- iii. The development is exempt as set out in the supporting text below.'*

MD16 (3) states the requirement for non-mineral applications within an MSA to be accompanied by a Mineral Assessment and MD16 (4) states that a MSA designation is not a material consideration in the determination of applications for mineral development. Allocations for future sand & gravel working are identified by Policy MD5 at Conover (Gonsal), Ellesmere (Wood Lane North Extension) and Morville Quarry (extension). Review of the document shows that the Property has not received an allocation for mineral extraction.

SC is currently conducting a partial review of the local plan for the period from 2016 - 2036 in accordance with para. 153 of the National Planning Policy Framework (NPPF). As part of that review process, a number of preferred strategic sites have been identified within a '*Strategic sites Consultation Document*'. None of those sites are mineral specific although it is noted that a significant mineral resource has been identified at the 140ha '*Former Ironbridge Power Station Site*'.

The latest Local Aggregates Assessment for Shropshire (2016-2017) identified a sand & gravel landbank of 16.94 years; more than twice the minimum 7-year landbank required by the NPPF. This

estimate does not include the three additional sites allocated by Policy MD5 of the SAMDev nor the ‘windfall’ consents otherwise granted and listed below:

Application Reference	Proposal	Applicant	Status	Additional Reserves Permitted
17/04868/MAW	<i>‘Extraction of sand and gravel...’</i> at Bayston Hill Quarry (extension of existing site)	Tarmac Trading Ltd	Granted	130,000 tonnes
17/05303/MAW	<i>‘The phased extraction of sand and gravel...’</i> on Land near Shipley.	JPE Holdings Ltd	Granted	3.5 million tonnes
19/01261/MAW	<i>‘Application for a southern extension...’</i> at Conover Quarry	Hanson Aggregates Ltd	Decision Pending	2.854 million tonnes
SC/MB2005/0336/BR	<i>‘Construction of access to B4379, extraction and processing of sand and Gravel...’</i> at Woodcote Wood	NRS Limited	Granted	2.5 million tonnes – originally allocated within Shropshire Telford and Wrekin Minerals Local Plan (1996-2006) with planning stalled at the S106 stage. Inclusion within the LAA is unclear.

The 2016 - 17 LAA, windfall consents and the recent application for an extension to Conover Quarry all demonstrate that sand and gravel provision in Shropshire far exceeds the 7-year landbank requirement imposed by para. 207 of the NPPF. This clear abundance of supply is likely to have detrimental effects upon the economic viability of more marginal deposits within the County.

The compatibility of the proposed development with each of the exemption criteria outlined within MD16 (1) is demonstrated below:

‘The applicant can demonstrate that the mineral resource concerned is not of economic value’

Section 3 utilised a series of assumptions to identify an indicative sand & gravel resource of c.390,000 tonnes split over two resource blocks. That sand & gravel has value as a saleable product. However, for that value to be realised, the mineral must first be won, processed and transported to market.

It has been demonstrated that Indicative Resource Block A is already effectively sterilised by virtue of its proximity to the neighbouring SSSI and the lack of an access. That deposit cannot be worked, processed or transported from the Property and therefore has no clear economic value. Resource Block B is in a similar situation, albeit further from the SSSI. Whilst the deposit is somewhat larger, it is still too small to be readily considered economic as a greenfield mineral extraction site in isolation; with its surface area being severely reduced by necessary stand-offs detailed in Section 3.

‘The mineral can be extracted to prevent the unnecessary sterilisation of the resource prior to the development taking place without causing unacceptable adverse impacts on the environment and local community’

For the reasons outlined above, it is clear that the prior extraction of any potential sand and gravel deposit would cause *'...unacceptable adverse impacts on the environment and local community'*. Such a condition is also likely to render the Property unsuitable for the proposed non-mineral development.

We are aware of a recent public enquiry (Decision Ref: APP/Z1510/W/16/3146968) where mineral safeguarding was being considered as a potential constraint for a significant residential development (c.350 dwellings) at Silver End in Essex. The scheme was located within a Mineral Safeguarding Area designated by Essex's adopted Minerals Local Plan.

In this case the appellant had allowed for 100m stand-off (as opposed to the more conservative 50m used in this study) from residential properties and a 20m buffer to all other boundaries (identical to this study). As with the Property, the Silver End site was constrained by surrounding residential land uses, a poor-quality access, and an abnormal geometry making on-site processing of the resource incredibly difficult. The inspector accepted the practical difficulties imposed by these constraints.

Off-site processing of the mineral was considered; in this case at an active Quarry c.2.8 miles from the appeal site. However, at paragraph 75 (Decision Ref: APP/Z1510/W/16/3146968), the Inspector concluded that:

'there is no obvious reason why the owners and/or operators of that large and established facility would be agreeable to importing a competing source of sand and gravel'

In the case of the Property, the incompatibility of prior extraction using off-site processing is somewhat accentuated; with the nearest operational processing plants being 11.2 miles away (Hanson's Conover Quarry) and 13.1 miles away (Tudor Griffiths' Wood Lane Quarry) respectively. Whilst on-site processing using dry screening may be possible; it would act to further reduce the market for a deposit which has already been demonstrated to be uneconomic.

At Paragraph 77, the Inspector commented that:

'If the full depth of sand and gravel were extracted this would leave a deep and steep-sided bowl shape... That seems to me to be an unattractive proposition as a potential housing site. A further possibility explored at the Inquiry was that the excavation could be filled (or partially filled) with inert waste. That scenario would significantly increase the number of HGV movements imposed on the local road network.'

Whilst the c.2m estimated resource thickness is somewhat less significant than the deposit at the Silver End site any potential extraction has the potential to reduce ground levels, rendering the proposed non-mineral development unviable by removing the pre-existing development platform.

We acknowledge that in some cases; a (possibly improved) development platform can be created via the subsequent importation and engineering of inert fill. However, such operations present significant technical difficulties in the form of groundwater protection, town and country planning and environmental permitting (requiring materials management plans or waste recovery permits which may impose lining requirements). Such an operation would also severely accentuate the impacts of any prior extraction upon the amenity of surrounding residential properties; potentially doubling the number of HGV movements via the inadequate access.

At paragraph 77, the Inspector noted that '*...that there would be significant doubts about the suitability of the site for housing if prior extraction were to take place*'. At paragraph 96, the Inspector later states that '*It appears to me that the appeal scheme is unlikely to constrain potential future use of the site for mineral extraction because mineral extraction is unlikely to happen in any event*'. Whilst we acknowledge that Inspectors' decisions do not set precedents, they are an indication of the way that similar cases might be approached.

For the above reasons; it seems that prior extraction (using either off-site or on-site processing) of the resource is a challenging proposition and is likely neither economically viable nor practically feasible. Any such requirement would significantly reduce the viability of the proposed residential development.

'The development is exempt as set out in the supporting text below'

The exemption criteria outlined within MD16(3) are detailed below:

- i. applications for householder development;*
- ii. applications for alterations and extensions to existing buildings and for change of use of existing development, unless intensifying activity on site;*
- iii. applications that are in accordance with the development plan and site allocations where the assessment of site options took account of potential mineral sterilisation and determined that prior extraction was not required;*
- iv. applications for advertisement consent;*
- v. applications for reserved matters including subsequent applications after outline consent has been granted;*
- vi. prior notifications (telecoms, forestry, agriculture, demolition);*
- vii. Certificates of Lawfulness of Existing Use or Development (CLEUD) and Certificates of Lawfulness of Proposed Use or Development (CLOPUD);*
- viii. applications for works to trees;*
- ix. applications for temporary planning permission;*
- x. development types already specified in the Local Development Plan as exempt from the need for consideration on safeguarding grounds;*
- xi. applications for development of national, regional or local significance which outweighs the value of the mineral;*

We do not consider that the proposed residential development meets any of the criteria from i. to xi.

5 Conclusion

The Property is located within a Mineral Safeguarding area for Sand & Gravel designated by Shropshire Council's Site allocations and Management of Development plan. Policy MD16 (3) of that plan states the requirement for non-mineral applications within an MSA to be accompanied by a Mineral Assessment. This report fulfils that requirement.

This report demonstrates that Sand and Gravel Resources within the Property have been rendered uneconomic by environmental and access constrains; as well as pre-existing sterilisation brought about by a gas pipeline and surrounding residential dwellings. Should the mineral ever be worked, the aforementioned constrains would preclude on-site processing and that off-site processing would be neither economically viable nor practical.

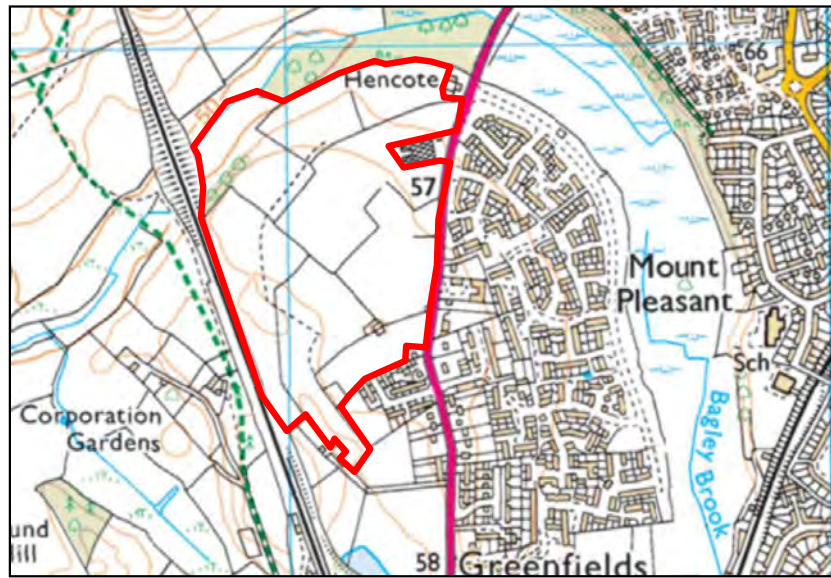
The report demonstrates that there is an abundance of high-quality Sand & Gravel deposits within the County and that the 7-year landbank requirement imposed by the NPPF has been exceeded. The sheer abundance of permitted Sand & Gravel reserves in the County could negatively impact the economic viability of any other sites.

Prior extraction of the mineral is also shown to be unfeasible. Such a condition has the potential to render the future residential development of the Property unviable by removing the pre-existing development platform. In a recent appeal decision for a similarly constrained residential scheme in Essex, the Inspector concluded that the proposed development was '*...unlikely to constrain potential future use of the site for mineral extraction because mineral extraction is unlikely to happen in any event.*' The situation at the Property is analogous.

We therefore consider that the proposed development is compliant with the requirements of Policy MD16 of Shropshire SAMDev Plan.

Appendix 1

Site Location Plan



DO NOT SCALE



NOTES:



Approx. Site Location



Approx. Site Boundary



kevinbullock1962@gmail.com

CLIENT:

BARWOOD LAND

PROJECT:

Land at Ellesmere Road,
Shrewsbury, Shropshire

TITLE:

Site Location Plan

SCALE@SIZE :

NTS

ISSUE:

Final

DESIGN/DRAWN :

KAB

DATE:

December 2019

PROJECT No:

19011

DRAWING No:

001

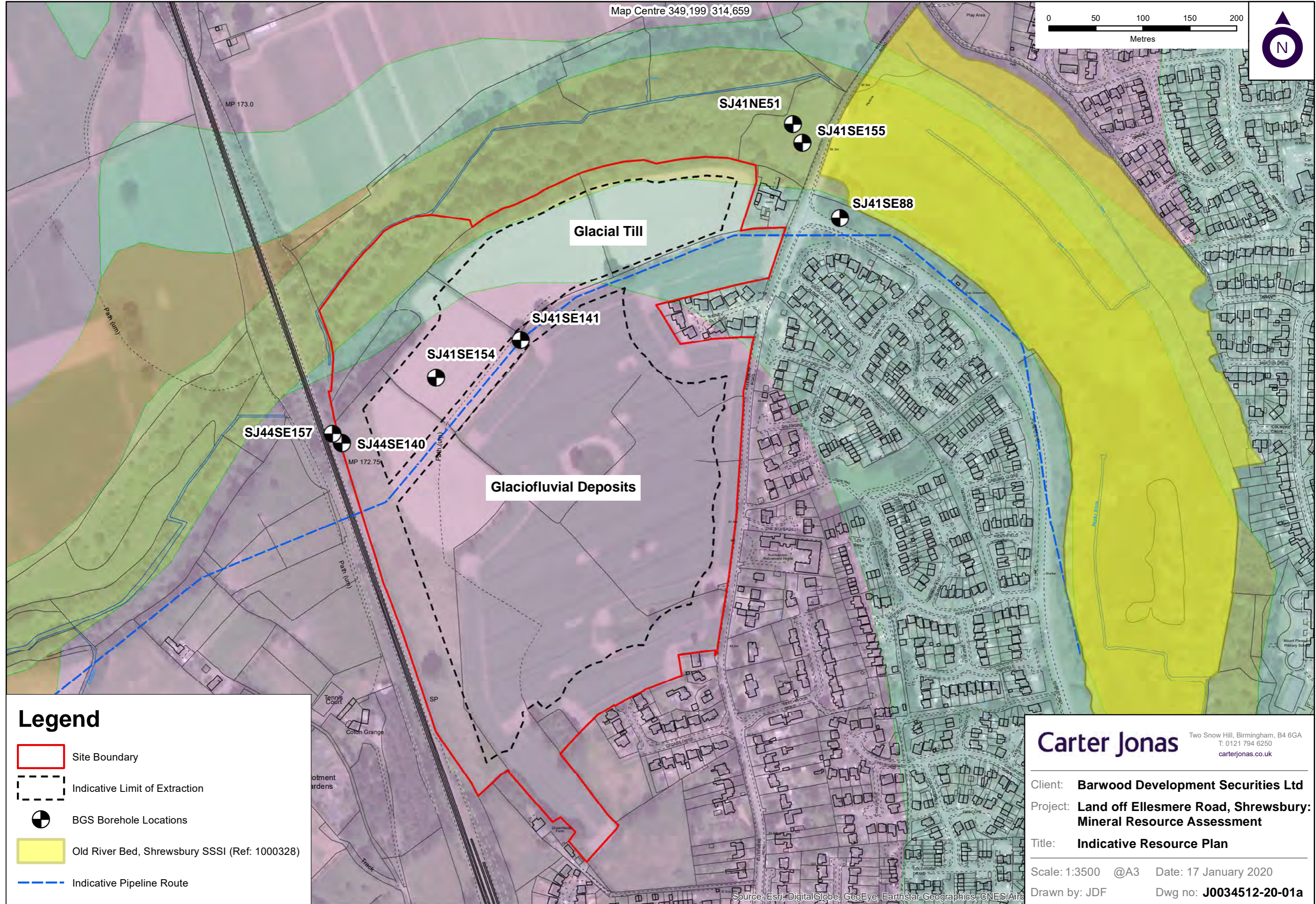
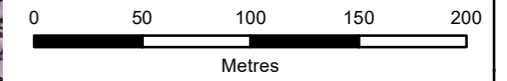
Appendix 2

Topographical Survey (Ref: 35420_T Rev 0; dated December 2019)






Appendix 3

Indicative Resource Areas

Map Centre 349,199 314,659



Legend

-  Site Boundary
-  Indicative Limit of Extraction
-  BGS Borehole Locations
-  Old River Bed, Shrewsbury SSSI (Ref: 1000328)
-  Indicative Pipeline Route

Carter Jonas Two Snow Hill, Birmingham, B4 6GA
T: 0121 794 6250
carterjonas.co.uk

Client: **Barwood Development Securities Ltd**

Project: **Land off Ellesmere Road, Shrewsbury: Mineral Resource Assessment**

Title: **Indicative Resource Plan**

Scale: 1:3500 @A3 Date: 17 January 2020

Drawn by: JDF Dwg no: **J0034512-20-01a**

APPENDIX 5: Highways Technical Note

Technical Note

Project: Land off Ellesmere Road, Shrewsbury

Subject: Transport Appraisal

Client:	Barwood Land	Version:	B
Project No:	4006	Author:	BS
Date:	26th January 2021	Approved:	SB

I Introduction

I.1 Purpose of Note

- 1.1.1 PJA has been commissioned by Barwood Land to provide representations for the change of wording of the Local Plan allocation for the 'Land West of Ellesmere Road, Shrewsbury site (SHR173). The site is allocated for 450 residential dwellings.
- 1.1.2 The purpose of this note is to provide evidence to demonstrate that a parcel of development should be considered for early release, prior to the implementation of the North West Relief Road (NWRR).

I.2 Structure of Note

- 1.2.1 Following this section, the remainder of the note is structured as follows:
- Section 2: Background and Context;
 - Section 3: Travel Demand; and
 - Section 4: Summary and Conclusion.

2 Background and Context

2.1 Shropshire Council Position

- 2.1.1 It is understood that Shropshire County highways (SC) have commissioned further strategic traffic modelling to inform the Local Plan, which includes modelling the allocated sites and strategic infrastructure improvements.
- 2.1.2 In relation to the Land West of Ellesmere Road site, a series of initial meetings to discuss the highways strategy for the scheme were held in late 2019 and early 2020. Whilst SC's starting

position is such that the site cannot come forward prior to the opening of the NWRR, it was agreed that early release of development would be considered as further evidence is presented. The salient points at the meetings were as follows:

- The NWRR scheme now includes the Oxon Link Road scheme. Detailed designs are being progressed and current timescales are for construction to start in 2021 and complete in 2024.
- SC would be looking to put a cap on development at Land West of Ellesmere Road prior to the opening of the NWRR. However, SC understand that an early release of development will enable S106 contributions and are open to reviewing evidence to support that.
- The Local Plan allocation is likely to be worded such that early release of development is possible, subject to further modelling and review. It won't therefore be specific on dwelling numbers at this stage.
- SC's starting point on the cap is 50 dwellings but as and when the evidence is presented then they will reconsider.
- SC would be looking for an assessment of the following junctions as part of this evidence base:
 - Battlefield roundabout;
 - Ellesmere Road/Harlescott Lane ghost right turn priority;
 - Ellesmere Road/Hubert Way ghost right turn priority;
 - Ellesmere Road/Berwick Road signals; and
 - Station gyratory
- SC will be looking for the shortfall in funding for the NWRR (circa £17m) to be funded via CIL and S106. SC and WSP are currently working on the mechanism and justification for any S106 contribution levels sought from Local Plan allocations, with a view to completing this prior to the Local Plan adoption.

2.1.3 This note therefore provide an initial evidence base to demonstrate that an early release of development is acceptable.

3 Travel Demand

3.1 Development Scenarios

3.1.1 In order to determine the level of development achievable prior to the NWRR, the following development quantum's have been assessed:

- Scenario A – 50 dwellings;
- Scenario B – 100 dwellings;
- Scenario C – 150 dwellings;
- Scenario D – 200 dwellings; and
- Scenario E – 250 dwellings.

3.2 Vehicle Trip Generation

3.2.1 In order to identify the likely trip generation of the proposed development, trip rates have been taken from the approved Transport Assessment submitted as part of the 14/05343/FUL application, located 750m to the south of the proposed development. The trip rates are detailed in Table 1 below.

Table 1: Approved Trip Rates

	AM Peak			PM Peak		
	Arrive	Depart	Total	Arrive	Depart	Total
Trip Rate (per dwelling)	0.146	0.398	0.544	0.384	0.236	0.620

3.2.2 The resultant trip generation associated with each assessment scenario is detailed in Table 2 below.

Table 2: Scenario Trip Generation

	AM Peak			PM Peak		
	Arrive	Depart	Total	Arrive	Depart	Total
Scenario A (50 dwellings)	7	20	27	19	12	31
Scenario B (100 dwellings)	15	40	54	38	24	62
Scenario C (150 dwellings)	22	60	82	58	35	93
Scenario D (200 dwellings)	29	80	109	77	47	124
Scenario E (250 dwellings)	37	100	136	96	59	155

3.3 Trip Distribution and Route Assignment

3.3.1 The likely trip distribution and route assignment associated with the proposed development has been identified using a gravity model. This gravity model identifies the different trip distributions associated with journey purposes.

3.3.2 TEMPRO data has been collected for the local ‘Shropshire 017’ super output area – middle layer (MSOA) in order to determine the journey purpose for the site. The TEMPRO journey purposes have been aggregated into the ‘Employment’, ‘Education’ and ‘Retail’ categories as follows:

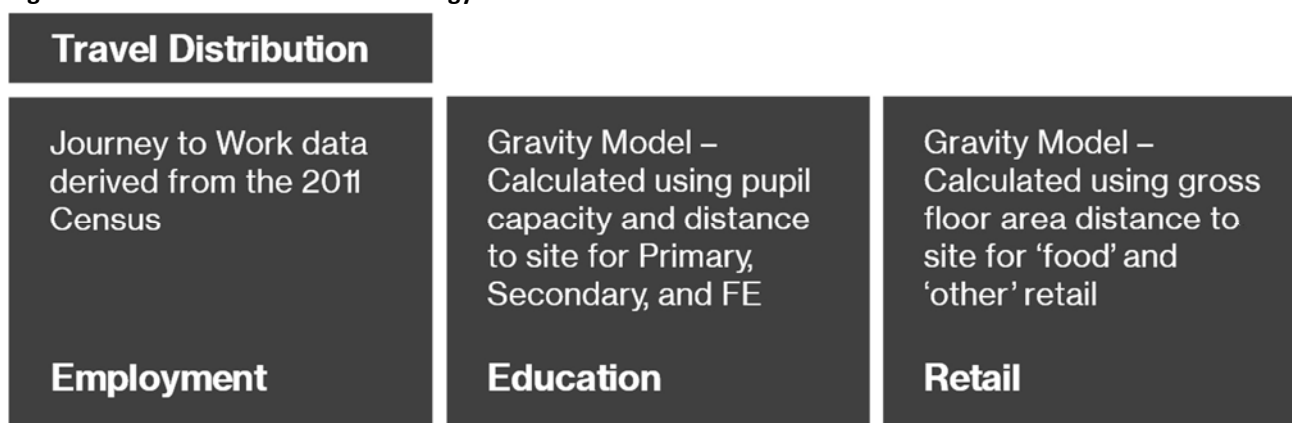
- **Employment** – ‘Work’, ‘Employers Business’, ‘Personal Business’;
- **Education** - ‘Education’; and
- **Retail** – ‘Shopping’, ‘Recreation’, ‘Visit’, ‘Holiday’.

Table 3: TEMPRO – Journey Purpose Proportions

Journey Purpose	AM Peak (08:00-09:00)	PM Peak (17:00-18:00)
Employment	65%	48%
Education	12%	5%
Retail/Leisure	23%	47%
Total	100%	100%

3.3.3 A manual approach to traffic distribution has been carried out for each journey purpose as indicated in Figure 1.

Figure 1: Travel Distribution Methodology



3.3.4 A zone system has been identified to ensure that there is a common basis for the distribution of trips by each journey purpose.

Journey Purpose - Employment

3.3.5 The employment trip distribution has been calculated using ‘Journey to Work’ data derived from the 2011 Census. The trip distribution of vehicular employment trips for those whose ‘usual residence’ was ‘Shropshire 017’ MSOA has been used as a proxy for trips generated by the residential development.

3.3.6 ArcGIS software has been used to identify the trip assignment and assign the distribution to a zone.

Journey Purpose - Education

- 3.3.7 The trip generation for education journeys at the proposed development has been distributed using a gravity model for ‘Primary’, ‘Secondary’, and ‘Further Education’ (FE) elements individually.
- 3.3.8 For the purposes of this assessment, expected pupil proportions from the development have been calculated based on the age structure of the Shropshire 017 MSOA, from 2011 census data. The proposed development is estimated to have the following:
- 48% primary aged pupils (aged 5-11);
 - 35% secondary aged pupils (aged 11-16); and
 - 17% further education pupils (aged 16-18).
- 3.3.9 When considered in conjunction with the development proposals it is possible to calculate the number of education journeys to and from the site.
- 3.3.10 Given that no school is proposed as part of the allocation, for primary, secondary and further education, demand has been determined based on the capacity of and distance from the site to the education establishment. Further to this, a factor has been applied to the model which weights establishments in favour of distance over capacity. This assumes that pupils are more likely to go to and be accepted at their nearest establishment.

Table 4: Pupil Trip Destinations

School / College	Pupil Capacity ¹	Distance to Site (km) ²	Weighted Distribution	Zone
Primary School				
Grange Primary	261	2.1	7%	13
Greenacres Primary School	166	1.9	6%	13
Mount Pleasant Primary	314	2.6	6%	13
Greenfields Primary School	400	0.8	76%	12
The Martin Wilson School	217	2.2	5%	12
Secondary School				
Belvidere School	838	3.8	16%	12
The Priory School	843	4.5	11%	9
Meole Brace School Science College	1220	5.2	12%	9
Shrewsbury High School	560	2.8	19%	9

¹ Pupil capacity has been sourced from <https://www.compare-school-performance.service.gov.uk/find-a-school-in-england>.

² Distance calculated as driving distance from proposed site access point on Ellesmere Road

School / College	Pupil Capacity ¹	Distance to Site (km) ²	Weighted Distribution	Zone
Shrewsbury School	790	3.9	14%	10
Shrewsbury Academy	828	3.6	17%	13
Severndale	405	3.2	11%	12
Total	-	-	100%	-
Further Education				
Severndale	405	3.2	24%	12
Shrewsbury high School	560	2.8	44%	9
Shrewsbury School	790	3.9	32%	10
Total	-	-	100%	-

Journey Purpose - Retail/Leisure

- 3.3.11 The forecast vehicle trips for retail and leisure trips from the proposed development have been distributed using a gravity model that is based on likely destinations within a 5km catchment of the site.
- 3.3.12 The retail gravity model determines demand based on the 'size' (measured in gross floor area) of the retail element and 'distance to the site'. A factor has been applied that weights retail elements in favour of distance over size.

Table 5: Retail/Leisure Destinations

Retail/Leisure Area	Retail Workplace Population ³	Distance to Site (km)	Weighted Distribution	Zone
Harlescott Industrial Centre	3,199	3.0	43%	4
Shrewsbury Town Centre	2,506	2.3	57%	10

Total Trip Distribution

- 3.3.13 The distribution for each journey purpose has been applied to the TEMPRO journey purpose proportions to identify a total trip distribution/assignment. The forecast assignment is shown in Table 6.

³ Census 2011 Workplace Population within the 'Wholesale and Retail Trade' (WP605EW) figures have been used as a proxy for the amount of retail. The workplace population within the MSOA(s) that the area sits within has been used (Harlescott Industrial Estate – Shropshire 015 and Shropshire 016, Shrewsbury Town Centre - Shropshire 019).

Table 6: Total Trip Distribution

Zone	AM	PM
1	4%	3%
2	2%	1%
3	17%	13%
4	10%	20%
5	4%	3%
6	0%	0%
7	2%	1%
8	0%	0%
9	8%	5%
10	32%	40%
11	0%	0%
12	7%	2%
13	15%	10%
Total	100%	100%

4 Development Trips

4.1 Junction Impact

4.1.1 Based on the distribution/assignment identified above, the two-way development trips for each scenario are summarised in Table 7.

4.1.2 The number of development trips on the five key junctions identified by SC have been considered, as follows:

- Battlefield Roundabout;
- A528 Ellesmere Road/Harlescott Lane ghost right turn priority junction;
- A528 Ellesmere Road/Hubert Way ghost right turn priority junction;
- A528 Ellesmere Road/Berwick Road signalised junction; and
- Shrewsbury Station Gyratory.

Figure 2: Junction Locations



Table 7: Development Trips at Junctions

Zone	A		B		C		D		E	
	AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
1- Battlefield Roundabout	9	12	18	23	27	35	36	47	45	58
2- A528 Ellesmere Road/Harlescott Lane	10	12	20	25	30	37	40	50	50	62
3- A528 Ellesmere Road/Hubert Way	14	16	28	31	42	47	56	63	70	79
4- A528 Ellesmere Road/Berwick Road	11	15	23	29	34	44	45	58	57	73
5- Shrewsbury Station Gyratory	11	15	23	29	34	44	45	58	57	73

4.1.3 The results in Table 7 indicate that:

- Scenario A (50 dwellings) results in less than 30 additional two-way trips on all junctions. As a result, it is considered that this level of development could be accommodated on the highway network prior to the NWRR without having a significant impact on junction capacity.

- Scenario B (100 dwellings) results in fewer than 30 additional two-way trips at all junctions in the AM peak, and 31 in the PM peak. Whilst this slightly exceeds the threshold in the PM peak, it is considered that this level of development could be accommodated on the highway network prior to the NWRR without having a significant impact on junction capacity.
- Scenario C (150 dwellings) results in a maximum of 42 and 47 additional trips on any junction in a peak hour, which is less than one trip per minute. It is considered that this level of additional trips will not significantly impact on junction capacity, however further assessment may be justified.
- The levels of additional two-way trips associated with Scenarios D and E (200-250 dwellings respectively) are such that further local junction capacity assessments are likely to be required to determine the capacity of the network, prior to the implementation of the NWRR.

4.1.4 Further assessment would require valid traffic surveys at each junction to enable capacity assessments to be undertaken. Given the current Covid-19 lockdown and travel restrictions, any such survey is unable to be commissioned at present, however, in correspondence with SC it may be possible to utilise existing surveys (undertaken within the most recent five years) to provide further evidence.

4.2 Ellesmere Road Impact

4.2.1 The NWRR Outline Business Case document contains two-way peak hour traffic volumes on Ellesmere Road in 2017. The development trips have been analysed in relation to the existing traffic volumes, and are summarised in Table 8 below.

Table 8: Link Analysis – Ellesmere Road

Scenario		Link							
		Ellesmere Road (north of Mount Pleasant)		Ellesmere Road (Mt Pleasant to Hubert Way)		Ellesmere Road (South of Hubert Way) ⁴			
						North		South	
		AM	PM	AM	PM	AM	PM	AM	PM
Existing	Flow	1188	1162	1087	983	1040	905	1040	905
Scenario A	Flow	10	12	14	16	14	16	13	15
	% Increase	1%	1%	1%	2%	1%	2%	1%	2%
Scenario B	Flow	20	25	28	31	28	31	26	31
	% Increase	2%	2%	3%	3%	3%	3%	2%	3%
Scenario C	Flow	30	37	42	47	42	47	39	46
	% Increase	2%	3%	4%	5%	4%	5%	4%	5%
Scenario D	Flow	40	50	56	63	56	63	52	61
	% Increase	3%	4%	5%	6%	5%	6%	5%	6%
Scenario E	Flow	50	62	70	79	70	79	66	76
	% Increase	4%	5%	6%	7%	6%	8%	6%	8%

4.2.2 Table 8 identifies that Scenarios A and B would equate to an increase of no more than 3% on any link in either the AM or PM peak periods. This level of increase is considered to fall within the realm of typical daily variation and therefore not likely to have a significant impact on highway capacity.

5 Summary and Conclusion

5.1.1 PJA has been commissioned by Barwood Land to provide representation for the change of wording of the Local Plan allocation for the 'Land West of Ellesmere Road, Shrewsbury site (SHR173).

5.1.2 The technical note has demonstrated that an initial phase of up to 100 dwellings could sufficiently be accommodated on the highway network without a significant impact, prior to the implementation of the NWRR.

5.1.3 Further detailed capacity assessments would be required to evidence whether any additional dwellings could also be considered as part of an early phase of development, prior to the implementation of the NWRR.

⁴ Link 3 split into North and South for the purpose of this assessment, as access to the development will be onto this link.